

# 2002 IHCIF



## **FY 2001 FEHBP Disparity Index and Application of Findings to Allocate the FY 2002 Indian Health Care Improvement Fund**



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**Documents available on the IHS website at:**

**[WWW.IHS.GOV/NONMEDICALPROGRAMS/LNF](http://WWW.IHS.GOV/NONMEDICALPROGRAMS/LNF)**

**March, 2002**



# **Tab A**



## **Table of the 2002 IHCIF distribution among local operating units**



**[WWW.IHS.GOV/NONMEDICALPROGRAMS/LNF](http://WWW.IHS.GOV/NONMEDICALPROGRAMS/LNF)**

**March, 2002**

Table 8 -- FY 2002 IHCIF Distribution-- Revised May 6, 2002

## Distribution of the FY 2002 \$23 Million IHCIF

## Summary for IHS Areas

Area	Operating Unit	2001 Users	%	Needed \$ For 60%	IHCIF Allocation	IHCIF / User	New %
Aberdeen Total		120,593	53%	\$28,522,647	\$1,529,000	\$13	54%
Alaska Total		119,016	58%	\$38,998,654	\$2,104,000	\$18	59%
Albuquerque Total		84,279	52%	\$18,592,645	\$998,000	\$12	52%
Bemidji Total		95,939	36%	\$68,768,321	\$3,962,000	\$41	38%
Billings Total		69,404	62%	\$6,701,308	\$360,000	\$5	62%
California Total		68,045	49%	\$22,994,634	\$1,257,000	\$18	50%
Nashville Total		49,835	57%	\$9,455,751	\$899,000	\$18	57%
Navajo Total		224,986	54%	\$41,867,854	\$2,245,000	\$10	55%
Oklahoma Total		301,338	43%	\$114,797,659	\$6,388,000	\$21	44%
Phoenix Total		137,017	54%	\$36,519,006	\$1,970,000	\$14	55%
Portland Total		94,124	55%	\$20,942,205	\$1,127,000	\$12	56%
Tucson Total		23,406	51%	\$2,851,629	\$161,000	\$7	52%
<b>Grand Total</b>		<b>1,387,982</b>	<b>51%</b>	<b>\$411,012,313</b>	<b>\$23,000,000</b>	<b>\$17</b>	<b>52%</b>

Table 8 -- FY 2002 IHCIF Distribution-- Revised May 6, 2002

## Distribution of the FY 2002 \$23 Million IHCIF

Area	Operating Unit	2001 Users	%	Needed \$ For 60%	IHCIF Allocation	IHCIF / User	New %
Aberdeen	Sac & Fox	1,402	33%	\$1,294,509	<b>\$69,000</b>	\$49	35%
Aberdeen	Winnebago	4,312	76%	\$0	<b>\$0</b>	\$0	76%
Aberdeen	Omaha	3,462	57%	\$354,561	<b>\$19,000</b>	\$5	57%
Aberdeen	Santee	1,176	41%	\$773,390	<b>\$41,000</b>	\$35	42%
Aberdeen	Northern Ponca	1,667	49%	\$629,364	<b>\$34,000</b>	\$20	50%
Aberdeen	Turtle Mountain	14,303	66%	\$0	<b>\$0</b>	\$0	66%
Aberdeen	Standing Rock	9,960	45%	\$4,412,054	<b>\$237,000</b>	\$24	46%
Aberdeen	Spirit Lake (Ft. Totten)	5,206	45%	\$2,469,740	<b>\$132,000</b>	\$25	46%
Aberdeen	Three Affiliated (Ft. Berthold)	6,025	44%	\$2,871,999	<b>\$154,000</b>	\$26	45%
Aberdeen	Trenton	1,583	48%	\$646,240	<b>\$35,000</b>	\$22	49%
Aberdeen	Rapid City	11,019	47%	\$4,006,493	<b>\$215,000</b>	\$20	48%
Aberdeen	Cheyenne River	8,131	45%	\$3,630,888	<b>\$195,000</b>	\$24	46%
Aberdeen	Pine Ridge	21,716	60%	\$0	<b>\$0</b>	\$0	60%
Aberdeen	Rosebud	12,349	58%	\$897,051	<b>\$48,000</b>	\$4	58%
Aberdeen	Sisseton-Wahpeton	6,192	43%	\$3,251,480	<b>\$174,000</b>	\$28	44%
Aberdeen	Yankton	4,658	54%	\$841,438	<b>\$45,000</b>	\$10	55%
Aberdeen	Flandreau	1,783	39%	\$1,265,035	<b>\$68,000</b>	\$38	40%
Aberdeen	Crow Creek	3,682	53%	\$798,373	<b>\$43,000</b>	\$12	54%
Aberdeen	Lower Brule	1,967	54%	\$380,035	<b>\$20,000</b>	\$10	55%
<b>Aberdeen Total</b>		<b>120,593</b>	<b>53%</b>	<b>\$28,522,647</b>	<b>\$1,529,000</b>	<b>\$13</b>	<b>54%</b>
Alaska	Aleutian Pribilof Islands Associator	928	60%	\$15,633	<b>\$10,000</b>	\$11	60%
Alaska	Arctic Slope Regional Tribe	4,516	58%	\$428,690	<b>\$23,000</b>	\$5	58%
Alaska	Bristol Bay Area Health	6,292	70%	\$0	<b>\$0</b>	\$0	70%
Alaska	Chugachmiut Tribe	1,752	54%	\$511,181	<b>\$27,000</b>	\$15	54%
Alaska	Copper River Native Associaton	542	93%	\$0	<b>\$0</b>	\$0	93%
Alaska	Eastern Aleutian Tribe	959	38%	\$1,109,092	<b>\$59,000</b>	\$62	39%
Alaska	Kenaitze Indian Tribe	1,501	49%	\$670,697	<b>\$36,000</b>	\$24	50%
Alaska	Ketchikan Indian Corporation	2,937	38%	\$3,088,304	<b>\$166,000</b>	\$57	39%
Alaska	Kodiak	2,402	52%	\$938,911	<b>\$50,000</b>	\$21	52%
Alaska	Maniilaq	7,117	91%	\$0	<b>\$0</b>	\$0	91%
Alaska	Metlakatla Indian Tribe	1,303	36%	\$1,564,003	<b>\$84,000</b>	\$64	37%
Alaska	Misc. Anchorage Tribes	358	120%	\$0	<b>\$0</b>	\$0	120%
Alaska	Ninilchik	275	51%	\$128,564	<b>\$10,000</b>	\$36	52%
Alaska	Norton Sound	6,910	59%	\$196,654	<b>\$11,000</b>	\$2	59%
Alaska	Seldovia	500	48%	\$301,864	<b>\$16,000</b>	\$32	49%
Alaska	Southcentral Foundation	32,918	76%	\$0	<b>\$0</b>	\$0	76%
Alaska	Southeast Alaska Regional	12,062	60%	\$0	<b>\$0</b>	\$0	60%
Alaska	Tanana Chiefs Conference	13,751	39%	\$12,225,672	<b>\$656,000</b>	\$48	40%
Alaska	Yukon Kuskokwim	21,993	40%	\$17,819,389	<b>\$956,000</b>	\$43	41%
<b>Alaska Total</b>		<b>119,016</b>	<b>58%</b>	<b>\$38,998,654</b>	<b>\$2,104,000</b>	<b>\$18</b>	<b>59%</b>
Albuquerque	Albuquerque	30,865	42%	\$12,714,297	<b>\$682,000</b>	\$22	43%
Albuquerque	Acoma-Canoncito-Laguna	11,219	55%	\$1,322,044	<b>\$71,000</b>	\$6	56%
Albuquerque	Mescalero	4,414	51%	\$1,022,484	<b>\$55,000</b>	\$12	52%
Albuquerque	Santa Fe	17,451	61%	\$0	<b>\$0</b>	\$0	61%
Albuquerque	Zuni	8,827	56%	\$848,559	<b>\$46,000</b>	\$5	57%
Albuquerque	Ramah	2,014	52%	\$501,964	<b>\$27,000</b>	\$13	53%
Albuquerque	So Colorado Ute	5,668	51%	\$1,359,618	<b>\$73,000</b>	\$13	51%
Albuquerque	Ysleta Del Sur	702	109%	\$0	<b>\$0</b>	\$0	109%
Albuquerque	Jicarilla	3,119	51%	\$823,679	<b>\$44,000</b>	\$14	51%
<b>Albuquerque Total</b>		<b>84,279</b>	<b>52%</b>	<b>\$18,592,645</b>	<b>\$998,000</b>	<b>\$12</b>	<b>52%</b>
Bemidji	Bad River	1,985	39%	\$1,288,849	<b>\$69,000</b>	\$35	41%
Bemidji	Bay Mills	1,215	33%	\$1,156,513	<b>\$62,000</b>	\$51	34%

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Area	Operating Unit	2001 Users	%	Needed \$ For 60%	IHCIF Allocation	IHCIF / User	New %
Bemidji	Fond Du Lac	5,685	33%	\$4,628,626	<b>\$248,000</b>	\$44	35%
Bemidji	Forest County	854	59%	\$41,300	<b>\$10,000</b>	\$12	59%
Bemidji	Grand Portage	476	47%	\$203,424	<b>\$11,000</b>	\$23	48%
Bemidji	Grand Traverse	2,068	37%	\$1,369,154	<b>\$73,000</b>	\$35	38%
Bemidji	Greater Leech Lake	9,823	31%	\$8,020,010	<b>\$430,000</b>	\$44	33%
Bemidji	Greater Red Lake	7,345	52%	\$1,788,589	<b>\$96,000</b>	\$13	52%
Bemidji	Greater White Earth	8,292	46%	\$3,475,382	<b>\$186,000</b>	\$22	46%
Bemidji	Ho-Chunk	4,179	31%	\$3,718,746	<b>\$199,000</b>	\$48	33%
Bemidji	Huron Potawatomi	612	39%	\$436,312	<b>\$23,000</b>	\$38	40%
Bemidji	Keweenaw Bay	1,682	32%	\$1,545,253	<b>\$83,000</b>	\$49	34%
Bemidji	Lac Courte Oreilles	3,659	35%	\$2,795,059	<b>\$150,000</b>	\$41	36%
Bemidji	Lac Du Flambeau	2,690	39%	\$1,817,133	<b>\$97,000</b>	\$36	40%
Bemidji	Lac Vieux Desert	438	64%	\$0	<b>\$0</b>	\$0	64%
Bemidji	Little River Ottawa	950	38%	\$687,472	<b>\$37,000</b>	\$39	39%
Bemidji	Little Traverse Odawa	2,500	39%	\$1,497,157	<b>\$80,000</b>	\$32	40%
Bemidji	Lower Sioux	605	30%	\$623,334	<b>\$33,000</b>	\$55	31%
Bemidji	Gun Lake	276	34%	\$238,937	<b>\$13,000</b>	\$47	36%
Bemidji	Menominee	6,958	31%	\$6,055,878	<b>\$325,000</b>	\$47	32%
Bemidji	Hannahville	929	31%	\$918,758	<b>\$49,000</b>	\$53	32%
Bemidji	Mille Lacs	2,784	27%	\$3,081,946	<b>\$321,000</b>	\$115	30%
Bemidji	Bois Forte/Nett Lake	1,203	50%	\$369,331	<b>\$20,000</b>	\$17	51%
Bemidji	Oneida	7,672	32%	\$6,052,385	<b>\$325,000</b>	\$42	34%
Bemidji	Pokagon Potawatomi	2,391	34%	\$2,150,964	<b>\$115,000</b>	\$48	35%
Bemidji	Prairie Island	350	43%	\$205,768	<b>\$11,000</b>	\$31	44%
Bemidji	Shakopee	468	33%	\$460,503	<b>\$25,000</b>	\$53	35%
Bemidji	Red Cliff	1,561	39%	\$1,117,256	<b>\$60,000</b>	\$38	40%
Bemidji	Saginaw Chippewa	2,264	27%	\$2,531,504	<b>\$247,000</b>	\$109	30%
Bemidji	Saulte Sainte Marie	9,971	33%	\$7,497,515	<b>\$402,000</b>	\$40	34%
Bemidji	Sokaogon	530	41%	\$327,998	<b>\$18,000</b>	\$34	42%
Bemidji	St Croix	1,649	30%	\$1,744,317	<b>\$94,000</b>	\$57	31%
Bemidji	Stockbridge-Munsee	1,504	48%	\$662,180	<b>\$36,000</b>	\$24	48%
Bemidji	Upper Sioux	371	39%	\$260,772	<b>\$14,000</b>	\$38	40%
<b>Bemidji Total</b>		<b>95,939</b>	<b>36%</b>	<b>\$68,768,321</b>	<b>\$3,962,000</b>	<b>\$41</b>	<b>38%</b>
Billings	Blackfeet	12,187	62%	\$0	<b>\$0</b>	\$0	62%
Billings	Crow	11,652	76%	\$0	<b>\$0</b>	\$0	76%
Billings	Ft Belknap	4,814	78%	\$0	<b>\$0</b>	\$0	78%
Billings	Ft Peck	8,601	59%	\$280,458	<b>\$15,000</b>	\$2	59%
Billings	No. Cheyenne	6,438	73%	\$0	<b>\$0</b>	\$0	73%
Billings	Wind River	10,104	51%	\$2,529,572	<b>\$136,000</b>	\$13	51%
Billings	Flathead	11,038	49%	\$3,891,278	<b>\$209,000</b>	\$19	50%
Billings	Rocky Boy	4,570	63%	\$0	<b>\$0</b>	\$0	63%
<b>Billings Total</b>		<b>69,404</b>	<b>62%</b>	<b>\$6,701,308</b>	<b>\$360,000</b>	<b>\$5</b>	<b>62%</b>
California	Berry Creek/Mooretown/Feather Riv	3,201	40%	\$1,782,359	<b>\$96,000</b>	\$30	41%
California	Cabazon	2	1312%	\$0	<b>\$0</b>	\$0	1312%
California	Central Valley	5,675	37%	\$3,437,426	<b>\$184,000</b>	\$32	38%
California	Chapa De	3,504	44%	\$1,609,269	<b>\$86,000</b>	\$25	45%
California	Colusa	140	49%	\$52,181	<b>\$10,000</b>	\$71	51%
California	Consolidated	2,858	35%	\$1,987,006	<b>\$107,000</b>	\$37	37%
California	Greenville	1,203	36%	\$876,963	<b>\$47,000</b>	\$39	37%
California	Hoopa	2,820	54%	\$470,490	<b>\$25,000</b>	\$9	54%
California	Indian Health Council	4,450	55%	\$664,955	<b>\$36,000</b>	\$8	55%
California	Karuk	1,858	59%	\$44,054	<b>\$10,000</b>	\$5	59%

Table 8 -- FY 2002 IHCIF Distribution-- Revised May 6, 2002

## Distribution of the FY 2002 \$23 Million IHCIF

Area	Operating Unit	2001 Users	%	Needed \$ For 60%	IHCIF Allocation	IHCIF / User	New %
California	Lake County	1,636	33%	\$1,341,320	<b>\$72,000</b>	\$44	34%
California	Lassen	982	45%	\$441,933	<b>\$24,000</b>	\$24	46%
California	Modoc	156	130%	\$0	<b>\$0</b>	\$0	130%
California	Northern Valley	1,435	47%	\$552,827	<b>\$30,000</b>	\$21	48%
California	Pit River	892	64%	\$0	<b>\$0</b>	\$0	64%
California	Quartz Valley	104	53%	\$20,583	<b>\$10,000</b>	\$96	57%
California	Redding Rancheria	4,098	53%	\$742,185	<b>\$40,000</b>	\$10	53%
California	Riverside/San Bernardino	9,739	65%	\$0	<b>\$0</b>	\$0	65%
California	Round Valley	1,069	49%	\$354,950	<b>\$19,000</b>	\$18	50%
California	Santa Ynez	849	29%	\$865,329	<b>\$46,000</b>	\$54	30%
California	Shingle Springs	854	38%	\$599,896	<b>\$32,000</b>	\$37	39%
California	Sonoma County	3,849	43%	\$1,886,772	<b>\$101,000</b>	\$26	44%
California	Southern Indian Health Council	2,574	60%	\$0	<b>\$0</b>	\$0	60%
California	Sycuan	85	98%	\$0	<b>\$0</b>	\$0	98%
California	Table Mountain	22	103%	\$0	<b>\$0</b>	\$0	103%
California	Toiyabe	2,788	49%	\$840,170	<b>\$45,000</b>	\$16	50%
California	Tule River	2,656	49%	\$791,713	<b>\$42,000</b>	\$16	50%
California	Tuolumne	2,132	49%	\$706,716	<b>\$38,000</b>	\$18	49%
California	United Indian Health Services	6,301	42%	\$2,925,540	<b>\$157,000</b>	\$25	43%
California	Warner Mountain	113	105%	\$0	<b>\$0</b>	\$0	105%
<b>California Total</b>		<b>68,045</b>	<b>49%</b>	<b>\$22,994,634</b>	<b>\$1,257,000</b>	<b>\$18</b>	<b>50%</b>
Nashville	Alabama Coushatta	845	56%	\$109,503	<b>\$10,000</b>	\$12	56%
Nashville	Catawba	1,072	77%	\$0	<b>\$0</b>	\$0	77%
Nashville	Cayuga	247	36%	\$177,219	<b>\$10,000</b>	\$40	37%
Nashville	Cherokee	10,343	55%	\$1,281,741	<b>\$69,000</b>	\$7	55%
Nashville	Chitimacha	431	69%	\$0	<b>\$0</b>	\$0	69%
Nashville	Choctaw	8,396	62%	\$0	<b>\$0</b>	\$0	62%
Nashville	Coushatta	499	55%	\$59,666	<b>\$10,000</b>	\$20	56%
Nashville	Houlton Band Of Maliseet	359	106%	\$0	<b>\$0</b>	\$0	106%
Nashville	Jena Band Of Choctaw	199	52%	\$42,146	<b>\$10,000</b>	\$50	54%
Nashville	Miccosukee	742	66%	\$0	<b>\$0</b>	\$0	66%
Nashville	Micmac	455	124%	\$0	<b>\$0</b>	\$0	124%
Nashville	Mohegan	1,264	30%	\$1,421,189	<b>\$76,000</b>	\$60	31%
Nashville	Narragansett	671	73%	\$0	<b>\$0</b>	\$0	73%
Nashville	Onondaga	1,873	21%	\$2,161,906	<b>\$481,000</b>	\$257	30%
Nashville	Oneida	1,879	49%	\$603,776	<b>\$32,000</b>	\$17	50%
Nashville	Pass.. Township	821	90%	\$0	<b>\$0</b>	\$0	90%
Nashville	Pass.-Pleasant Point	947	84%	\$0	<b>\$0</b>	\$0	84%
Nashville	Penobscot	1,334	76%	\$0	<b>\$0</b>	\$0	76%
Nashville	Pequot	897	39%	\$685,010	<b>\$37,000</b>	\$41	40%
Nashville	Poarch Creek	2,033	61%	\$0	<b>\$0</b>	\$0	61%
Nashville	St. Regis Mohawk	4,552	51%	\$1,085,303	<b>\$58,000</b>	\$13	51%
Nashville	Seminole	3,550	48%	\$1,119,701	<b>\$60,000</b>	\$17	49%
Nashville	Seneca	5,835	56%	\$662,814	<b>\$36,000</b>	\$6	56%
Nashville	Tunica-Biloxi	268	64%	\$0	<b>\$0</b>	\$0	64%
Nashville	Wampanoag Of Gayhead	323	56%	\$45,779	<b>\$10,000</b>	\$31	57%
<b>Nashville Total</b>		<b>49,835</b>	<b>57%</b>	<b>\$9,455,751</b>	<b>\$899,000</b>	<b>\$18</b>	<b>57%</b>
Navajo	Chinle	24,909	50%	\$5,678,720	<b>\$305,000</b>	\$12	51%
Navajo	Tsaille	7,757	33%	\$5,731,459	<b>\$307,000</b>	\$40	34%
Navajo	Crownpoint	19,584	48%	\$5,432,752	<b>\$291,000</b>	\$15	49%
Navajo	Fort Defiance	24,374	68%	\$0	<b>\$0</b>	\$0	68%
Navajo	Gallup	32,399	69%	\$0	<b>\$0</b>	\$0	69%



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Area	Operating Unit	2001 Users	%	Needed \$ For 60%	IHCIF Allocation	IHCIF / User	New %
Navajo	Tohatchi	8,911	40%	\$4,450,872	<b>\$239,000</b>	\$27	42%
Navajo	Kayenta	13,531	38%	\$7,139,998	<b>\$383,000</b>	\$28	40%
Navajo	Inscription House	4,284	34%	\$3,132,156	<b>\$168,000</b>	\$39	36%
Navajo	Shiprock	42,854	61%	\$0	<b>\$0</b>	\$0	61%
Navajo	Dzilh Na O Dith Hle	5,361	40%	\$2,878,196	<b>\$154,000</b>	\$29	41%
Navajo	Tuba City	26,596	58%	\$1,123,825	<b>\$60,000</b>	\$2	58%
Navajo	Winslow	14,426	42%	\$6,299,875	<b>\$338,000</b>	\$23	43%
<b>Navajo Total</b>		<b>224,986</b>	<b>54%</b>	<b>\$41,867,854</b>	<b>\$2,245,000</b>	<b>\$10</b>	<b>55%</b>
Oklahoma	Claremore	30,409	47%	\$8,362,129	<b>\$448,000</b>	\$15	48%
Oklahoma	Clinton	9,270	50%	\$2,102,275	<b>\$113,000</b>	\$12	51%
Oklahoma	Haskell	6,164	28%	\$4,797,177	<b>\$275,000</b>	\$45	30%
Oklahoma	Holton	2,284	33%	\$1,706,962	<b>\$92,000</b>	\$40	35%
Oklahoma	Lawton	22,819	46%	\$6,754,528	<b>\$362,000</b>	\$16	47%
Oklahoma	Pawnee	8,930	55%	\$1,015,666	<b>\$54,000</b>	\$6	55%
Oklahoma	Tahlequah	17,646	59%	\$308,283	<b>\$17,000</b>	\$1	59%
Oklahoma	Wewoka	8,851	32%	\$6,181,592	<b>\$331,000</b>	\$37	33%
Oklahoma	Abs Shawnee	4,390	45%	\$1,806,968	<b>\$97,000</b>	\$22	46%
Oklahoma	Chickasaw	30,218	51%	\$5,943,675	<b>\$319,000</b>	\$11	51%
Oklahoma	Cherokee	63,288	35%	\$34,843,600	<b>\$1,868,000</b>	\$30	36%
Oklahoma	Choctaw	33,041	55%	\$3,357,386	<b>\$180,000</b>	\$5	55%
Oklahoma	Creek	21,524	40%	\$9,190,908	<b>\$493,000</b>	\$23	41%
Oklahoma	Kaw	1,388	37%	\$870,690	<b>\$47,000</b>	\$34	38%
Oklahoma	Kickapoo Of Kansas	771	38%	\$471,663	<b>\$25,000</b>	\$32	39%
Oklahoma	Kickapoo Of Texas	538	70%	\$0	<b>\$0</b>	\$0	70%
Oklahoma	Ponca Tribe Of Oklahoma	3,606	47%	\$1,276,731	<b>\$68,000</b>	\$19	47%
Oklahoma	Kickapoo Of Oklahoma	6,582	28%	\$5,276,568	<b>\$330,000</b>	\$50	30%
Oklahoma	Citizen Potawatomi	12,922	28%	\$9,449,696	<b>\$675,000</b>	\$52	30%
Oklahoma	Iowa Of Oklahoma	1,154	32%	\$960,813	<b>\$52,000</b>	\$45	33%
Oklahoma	Sac And Fox Of Oklahoma	6,781	32%	\$4,630,745	<b>\$248,000</b>	\$37	34%
Oklahoma	Wyandotte / E Shawnee	1,239	33%	\$949,237	<b>\$51,000</b>	\$41	35%
Oklahoma	Miami Consortium	7,523	35%	\$4,540,368	<b>\$243,000</b>	\$32	36%
<b>Oklahoma Total</b>		<b>301,338</b>	<b>43%</b>	<b>\$114,797,659</b>	<b>\$6,388,000</b>	<b>\$21</b>	<b>44%</b>
Phoenix	Phoenix SU	54,777	45%	\$19,474,719	<b>\$1,044,000</b>	\$19	46%
Phoenix	Keams Canyon/Hopi	6,073	101%	\$0	<b>\$0</b>	\$0	101%
Phoenix	U&O	4,359	52%	\$941,990	<b>\$51,000</b>	\$12	53%
Phoenix	Whiteriver	14,436	50%	\$3,598,856	<b>\$193,000</b>	\$13	51%
Phoenix	Ft. Yuma	3,559	59%	\$129,516	<b>\$10,000</b>	\$3	59%
Phoenix	Colorado River	5,465	69%	\$0	<b>\$0</b>	\$0	69%
Phoenix	Peach Springs/Supai	2,290	61%	\$0	<b>\$0</b>	\$0	61%
Phoenix	San Carlos	10,844	42%	\$5,100,397	<b>\$274,000</b>	\$25	43%
Phoenix	Elko	2,023	70%	\$0	<b>\$0</b>	\$0	70%
Phoenix	Duckwater	134	210%	\$0	<b>\$0</b>	\$0	210%
Phoenix	Ely	291	109%	\$0	<b>\$0</b>	\$0	109%
Phoenix	Gila River	18,596	49%	\$4,779,217	<b>\$256,000</b>	\$14	50%
Phoenix	PITU	801	74%	\$0	<b>\$0</b>	\$0	74%
Phoenix	Owyhee	1,447	135%	\$0	<b>\$0</b>	\$0	135%
Phoenix	Schurz/Walker River	936	79%	\$0	<b>\$0</b>	\$0	79%
Phoenix	Fallon/Lovelock/Yomba	1,691	60%	\$17,338	<b>\$10,000</b>	\$6	60%
Phoenix	Pyramid Lake	1,625	53%	\$357,659	<b>\$19,000</b>	\$12	53%
Phoenix	Reno-Sparks/Nevada Urban	3,135	52%	\$727,035	<b>\$39,000</b>	\$12	53%
Phoenix	Las Vegas/Moapa	1,174	46%	\$548,212	<b>\$29,000</b>	\$25	47%
Phoenix	Ft. Mcdermitt	676	70%	\$0	<b>\$0</b>	\$0	70%

Table 8 -- FY 2002 IHCIF Distribution-- Revised May 6, 2002

## Distribution of the FY 2002 \$23 Million IHCIF

Area	Operating Unit	2001 Users	%	Needed \$ For 60%	IHCIF Allocation	IHCIF / User	New %
Phoenix	Washoe	2,126	47%	\$844,070	<b>\$45,000</b>	\$21	48%
Phoenix	Yerington	559	79%	\$0	<b>\$0</b>	\$0	79%
<b>Phoenix Total</b>		<b>137,017</b>	<b>54%</b>	<b>\$36,519,006</b>	<b>\$1,970,000</b>	<b>\$14</b>	<b>55%</b>
Portland	Burns Paiute	283	99%	\$0	<b>\$0</b>	\$0	99%
Portland	Chehalis	999	42%	\$591,300	<b>\$32,000</b>	\$32	43%
Portland	Coeur D'Alene	3,683	46%	\$1,437,991	<b>\$77,000</b>	\$21	47%
Portland	Colville	8,446	50%	\$2,105,156	<b>\$113,000</b>	\$13	51%
Portland	Coos, L Umpqua, Suislaw	597	73%	\$0	<b>\$0</b>	\$0	73%
Portland	Coquille	1,113	49%	\$402,658	<b>\$22,000</b>	\$20	49%
Portland	Cow Creek	1,752	34%	\$1,349,664	<b>\$72,000</b>	\$41	36%
Portland	Grand Ronde	3,067	63%	\$0	<b>\$0</b>	\$0	63%
Portland	Hoh	50	85%	\$0	<b>\$0</b>	\$0	85%
Portland	Jamestown S'Klallam	420	63%	\$0	<b>\$0</b>	\$0	63%
Portland	Kalispel	260	33%	\$223,266	<b>\$12,000</b>	\$46	34%
Portland	Klamath	2,202	63%	\$0	<b>\$0</b>	\$0	63%
Portland	Kootenai	195	71%	\$0	<b>\$0</b>	\$0	71%
Portland	Lower Elwha	776	55%	\$113,766	<b>\$10,000</b>	\$13	56%
Portland	Lummi	4,278	51%	\$1,031,677	<b>\$55,000</b>	\$13	52%
Portland	Makah	1,928	56%	\$227,346	<b>\$12,000</b>	\$6	56%
Portland	Muckleshoot	3,316	30%	\$2,882,056	<b>\$155,000</b>	\$47	31%
Portland	Nez Perce	3,455	71%	\$0	<b>\$0</b>	\$0	71%
Portland	Nisqually	748	69%	\$0	<b>\$0</b>	\$0	69%
Portland	Nooksack	919	45%	\$453,873	<b>\$24,000</b>	\$26	46%
Portland	Nw Band Of Shoshoni	127	89%	\$0	<b>\$0</b>	\$0	89%
Portland	Port Gamble	1,294	40%	\$802,593	<b>\$43,000</b>	\$33	41%
Portland	Puyallup	7,768	56%	\$736,802	<b>\$40,000</b>	\$5	56%
Portland	Quileute	564	38%	\$385,354	<b>\$21,000</b>	\$37	39%
Portland	Quinault	2,442	66%	\$0	<b>\$0</b>	\$0	66%
Portland	Samish	182	119%	\$0	<b>\$0</b>	\$0	119%
Portland	Sauk-Suiattle	171	109%	\$0	<b>\$0</b>	\$0	109%
Portland	Shoalwater Bay	420	118%	\$0	<b>\$0</b>	\$0	118%
Portland	Shoshone-Bannock	6,039	60%	\$0	<b>\$0</b>	\$0	60%
Portland	Siletz	4,706	44%	\$1,970,417	<b>\$106,000</b>	\$23	45%
Portland	Skokomish	734	66%	\$0	<b>\$0</b>	\$0	66%
Portland	Spokane	2,057	69%	\$0	<b>\$0</b>	\$0	69%
Portland	Snoqualmie	125	92%	\$0	<b>\$0</b>	\$0	92%
Portland	Squaxin Island	690	71%	\$0	<b>\$0</b>	\$0	71%
Portland	Stillaguamish	198	84%	\$0	<b>\$0</b>	\$0	84%
Portland	Suquamish	401	95%	\$0	<b>\$0</b>	\$0	95%
Portland	Swinomish	1,027	67%	\$0	<b>\$0</b>	\$0	67%
Portland	Tulalip	3,305	40%	\$1,908,059	<b>\$102,000</b>	\$31	41%
Portland	Umatilla	2,827	70%	\$0	<b>\$0</b>	\$0	70%
Portland	Upper Skagit	452	31%	\$381,360	<b>\$20,000</b>	\$44	32%
Portland	Warm Springs	5,221	77%	\$0	<b>\$0</b>	\$0	77%
Portland	Yakama	12,224	51%	\$2,723,081	<b>\$146,000</b>	\$12	51%
Portland	Western Oregon (Chemawa)	2,663	44%	\$1,215,788	<b>\$65,000</b>	\$24	45%
<b>Portland Total</b>		<b>94,124</b>	<b>55%</b>	<b>\$20,942,205</b>	<b>\$1,127,000</b>	<b>\$12</b>	<b>56%</b>
Tucson	Tonono O'Odham	17,884	53%	\$2,812,942	<b>\$151,000</b>	\$8	54%
Tucson	Yaqui	5,522	60%	\$38,686	<b>\$10,000</b>	\$2	60%
<b>Tucson Total</b>		<b>23,406</b>	<b>51%</b>	<b>\$2,851,629</b>	<b>\$161,000</b>	<b>\$7</b>	<b>52%</b>
<b>Grand Total</b>		<b>1,387,982</b>	<b>51%</b>	<b>\$411,012,313</b>	<b>\$23,000,000</b>	<b>\$17</b>	<b>52%</b>



# **Tab B**



## **Guidance for FY 2002 \$23 Million IHCIF**



This guidance for utilization of funds was issued with the formal funds allowances to IHS Area directors.

**March, 2002**

# **ALLOCATION & EXPENDITURE GUIDANCE for \$23 Million in the FY 2002 Indian Health Care Improvement Fund (IHCIF)**

## **Allocation Methodology for FY 2002**

The Director, IHS has decided to adopt the Indian Health Care Improvement Fund (IHCIF) allocation recommendations from the FEHBP Disparity Index (FDI) Workgroup. The decision memo and allocation tables are attached. Details for the FY 2002 IHCIF allocation are posted on the IHS website under Nation-wide Programs – Federal Disparity Index

## **Distribution Tables**

Tables showing the IHCIF distribution among all IHS Areas are attached to the allowance transmittals. Local units within each IHS Area are listed in the second column labeled “Operating Unit”. Amounts for qualifying units are listed in the 6th column labeled “IHCIF Allocation”. Operating units above the 60% average receive no IHCIF funds in FY 2002. The \$23 million IHCIF is only 5.6% of \$408 million necessary to raise 169 operating units to the 60% level. The formula also gives more funds to operating units with the lowest funding percentages.

## **Distribution Among Units Within the IHS Area**

Not all units identified in the table are self-contained units. The national application of the allocation methodology may incompletely account for certain complexities and variations in and among local level operating units. The Area Office, after consultation with affected parties, may distribute IHCIF operating unit funds among the constituent parts of operating units or among relevant operating units based on actual service usage patterns or similar equitable measures consistent with the governing language in section 1621 of the Indian Health Care Improvement Act. Language governing distribution of IHCIF funds specifies distribution criteria based on “health status and resource deficiency” taking into account “cost of providing health care services given local geographic, climatic, rural, and other considerations.”

## **Purpose and Use of Funds (Section 1621 of Indian Health Care Improvement Act)**

The Secretary is authorized to expend funds which are appropriated under the authority of this section, through the Service, for the purposes of -

- (1) eliminating the deficiencies in health status and resources of all Indian tribes,
- (2) eliminating backlogs in the provision of health care services to Indians,
- (3) meeting the health needs of Indians in an efficient and equitable manner, and
- (4) augmenting the ability of the Service to meet the following health service responsibilities, either through direct or contract care or through contracts entered into pursuant to the Indian Self-Determination Act (25 U.S.C. 450f et seq.), with respect to those Indian tribes with the highest levels of health status and resource deficiencies:
  - (A) clinical care (direct and indirect) including clinical eye and vision care;
  - (B) preventive health, including screening mammography in accordance with section 1621k of this title;
  - (C) dental care (direct and indirect);
  - (D) mental health, including community mental health services, inpatient mental health services, dormitory mental health services, therapeutic and residential treatment centers, and training of traditional Indian practitioners;
  - (E) emergency medical services;
  - (F) treatment and control of, and rehabilitative care related to, alcoholism and drug abuse (including fetal alcohol syndrome) among Indians;
  - (G) accident prevention programs;
  - (H) home health care;
  - (I) community health representatives; and
  - (J) maintenance and repair.

### **Recurring Distribution**

The Director, IHS has decided to distribute the \$23 million IHCIF on a **recurring** basis beginning with FY 2002. The IHS will annually assess and update the IHCIF allocation formula in subsequent years as additional IHCIF funds are appropriated.

# **Tab C**



## **March 26, 2002 IHCIF recommendations from the FDI Workgroup**



**This 7 page letter provides review of the IHCIF methodology and includes recommendations for the FY 2002 allocation formula.**

**March, 2002**

March 26, 2001

Dear Dr. Trujillo;

In FY 2000 and FY 2001, the Federal Disparity Index (FDI) workgroup, originally named the Level of Need Funded workgroup, developed a methodology for measuring gaps in health care funding to Indian people. The study found that Indian Health Service (IHS) funding was less than 60 percent of actuarially priced coverage if American Indians and Alaska Natives (AI/AN) were covered in the Federal Employees Health Benefit Plan. The workgroup also recommended a formula for distributing the Indian Health Care Improvement Fund (IHCIF) to tribes based on specifications contained in section 1621(a)4 of the Indian Health Care Improvement Act which requires the IHS to address deficiencies for "...those Indian tribes with the highest levels of health status and resource deficiencies."

In fiscal year 2001, the Indian Health Service (IHS) conducted extensive tribal consultation, including three regional forums and a national forum, on the IHCIF allocation methodology. After additional consultation with tribal leaders, in April 2001 you adopted an IHCIF formula that distributed \$40 million on a recurring basis to local operating units.

The FDI workgroup recently met March 19 and 20, 2002 to accomplish an annual review of the IHCIF allocation methodology applied with updated data. After reviewing the IHCIF formula and considering its application with revised data, ***the workgroup reaffirmed with no substantive changes the IHCIF formula adopted in FY 2001 after extensive tribal consultation.***

Before summarizing our recommendations, it is appropriate to briefly review the history of the equity issue as a means of placing in context our recommendations concerning the FY 2002 Indian Health Care Improvement Fund (IHCIF).

## BACKGROUND

The provision of a broad scope of health and public health services to the American Indian and Alaska Native (AI/AN) Tribes is a continuing responsibility of the U.S. government. Historically, these services have been provided through annual discretionary funding provided to the IHS. Over the past thirty years there has developed a chronic pattern of under funding. In recent years, the Congress has failed to provide sufficient funds to address even natural population growth and medical inflation. The resulting erosion of buying power has contributed to the disparity in health status among AI/AN communities.

In 1992 the Congress attempted to address this situation through the enactment of Section 1621 of the Indian Health Care Improvement Act, which authorized the IHCIF for "eliminating the deficiencies in health status and resources of all Indian tribes". Sadly no funds were appropriated to the IHCIF until eight years later. In December 1998 you created the LNF Workgroup and assigned to us the responsibility to develop a methodology to identify the health status and resource deficiency for each tribe as required in the Act.

In developing the methodology, the Workgroup has tried to uphold core principles of comparability and credibility based on objective data. Fundamentally, the FDI methodology makes an “apples to apples” comparison between the cost of service provided to the IHS active users and the cost of services provided by the Federal Employees Health Benefit Package, a mainstream health plan available to federal employees through out the nation. This comparison addresses personnel health care services, the core activity of the agency, but not the full scope of IHS services which include critical public health, environmental, and community sanitation programs. The approach we selected is based on an actuarial analysis of the IHS active user population that seeks to identify health care funding for AI/AN that is comparable to other Americans of similar age and health characteristics.

## REVISED AND UPDATED DATA

The most important change in the FY 2002 IHCIF allocation formula is the use of more recent data. A message universally expressed during LNF consultations last year was concern about dated and inaccurate data. We understand the IHS has worked to improve user counts for FY 2001 and to revise the national tabulation process to more accurately exclude individuals with duplicate records. We understand there is continuing concern about the user counts issued by the IHS on March 1, 2002, especially regarding adequate time for tribal consultation. After reviewing the FY 2001 user counts, we conclude they are more recent and more accurate than FY 1998 user counts and should be used in the IHCIF allocation formula. Below is a list of updated data elements that we recommend for use in the IHCIF formula. In the last section of this paper, we offer additional recommendations to improve data.

- **FY 2001 User Count** – The IHS user definition counts members of federally recognized tribes residing in a Contract Health Service Delivery Area (CHSDA) who visited an IHS or tribal health care program at least once during a three year period from October 1999 through September 2001. Applying this definition, the updated user count as of September 30, 2001 is 1,346,520. We understand that the apparent reduction of 55,000 users compared to FY 1998 is not, in fact, fewer real persons. Rather, more accurate tabulations eliminated substantial duplication in 1998 counts. As a result, the total IHS user count is approximately 3% less than the artificially elevated 1998 user counts. It is important to keep in mind that user counts for the 244 operating units were individually variable, e.g., some operating unit counts decreased by more than 10%, some increased by more than 10%, and still others remained essentially unchanged. Relative differences in FY 2002 operating unit allocations compared to FY 2001 operating unit allocations are due in large part to revised user counts (FY 2002 operating unit allocations are less in general because only \$23 million is available in FY 2002 compared to \$40 million in FY 2001).
- **User Add-On from Non-CHSDA areas** – Consistent with our recommendations last year, we add counts in the IHCIF formula for users who met all criteria in the user definition except residing within boundaries of a IHS CHSDA. This adds an additional 39,342 users for a total count of 1,385,862 for purposes of the IHCIF allocation formula.
- **11.2% Medical Inflation** – The benchmark price per user for a personal health care benefits package was \$3,221 in 2000. For FY 2001, we have inflated the price benchmark by 11.2%,



which is the overall percentage increase for employer sponsored health plans reported in a large national survey (Mercer Foster Higgins). The revised price benchmark is \$3,582 per user, an increase of \$361 compared to FY 2000. This single factor – 11.2% inflation for medical care in FY 2001 – has increased the cost to fully fund a mainstream benefits package for IHS users to \$4.96 billion, an increase of \$500 million over the FY 2000 estimate.

- **No New Data on Other Coverage** – Our estimate of health care payments for AI/AN by other sources remains at 25% of total cost of the benefits package, e.g., \$895 per user in 2001. Discounting the \$3,582 price benchmark by \$895 gives a net price of \$2,687 per user and results in a net benefits package cost to IHS of \$3.72 billion.
- **Updated Health Status Data** – We have revised the health status factors in the model to reflect more recent data provided by the IHS Office of Program Statistics. The health status indicators are used to adjust for cost variations resulting from differing health conditions of the user population residing in each IHS Area.
- **Updated IHS Available Resources** – IHS Area Offices have updated a detailed line-item accounting of all IHS funds distributed to operating units in FY 2001. Total IHS funding in FY 2001 was approximately \$330 million more than in FY 2000. Consistent with our methodology last year, we have discounted available resources to the extent the funds were used for purposes not in the benchmark personal health care benefits package, i.e., wrap-around items such as sanitation facilities and public health functions.
- **Geographic Price Variations are Unchanged** – Geographic variations in medical price indices are substantially stable year-to-year. No changes were made to this factor this year. Similarly, the workgroup granted price adjustments for high costs of remoteness and harsh climate that were documented for Alaska operating units in FY 2000. The Alaska price adjustments and exclusions were revised to reflect documented costs in FY 2001.
- **Variations in Operating Unit Cost** – The methodology adjusts the benchmark price among operating units for differences in economies of scale (unit prices for small operating units are adjusted higher compared to large operating units). No changes were made to this computation for FY 2001, although modest changes for individual operating units result from updated user counts.
- **Poverty Data are Unchanged** – No new data on the percentage of AI/AN below the poverty line were available this year. These data are unchanged in the FY 2002 formula.

## REAFFIRMED THE IHCIF RESOURCE ALLOCATION FORMULA

Applying FY 2001 data, the model estimated that \$3.72 billion was needed by IHS to assure personal health care services to IHS active users that are comparable to those available to federal employees. The IHS expended \$1.92 billion in FY 2001 for personal medical services – a funding ratio of 52% of need compared to 51% of need in FY 2000. The 1% net improvement in FY 2001 is a consequence of higher medical prices offset by a lower user count and increased appropriations to IHS. For the same time period, IHS expended \$.78 billion for community sanitation projects, public health programs, and other services not covered in the benchmark personal health care benefits package. The model does not estimate needed resources for these “wrap-around” health programs.

The model provides a “snap-shot” in time of the needs and funding of the Indian health care system, .e.g., a recent fiscal year in which user counts and funding are fully identified for the 244 operating units of the Indian health system. We consider the following estimates applicable to a snap-shot ending September 30, 2001. These estimates do not consider additional population growth, additional medical inflation, or funding distributed to operating units after September 30, 2001.

- Personal health care benefits package price benchmark = \$3,582 per user annually
- Cost to fully fund a benefits package for 1,385,000 users = \$4.96 billion
- Price benchmark net of other coverage = \$2,687 per user annually
- Balance of cost to IHS = \$3.72 billion
- IHS expenditures for personal health care = \$1.92 billion
- IHS personal health care expenditures per user = \$1,384
- Personal health care benefits package funding percentage = 52%  
(\$1,384 expenditures per user / \$2,687 benchmark price per user)
  - 62 OUs less than 40% (\$44 million shortfall)
  - 169 OUs less than 60% (\$408 million shortfall, cumulative)
  - 219 OUs less than 80% (\$1.1 billion shortfall, cumulative)
  - 229 OUs less than 100% (\$1.8 billion shortfall, cumulative)
- IHS expenditures for “wrap-around” programs = \$.78 billion
- “Wrap-around” expenditures per user = \$568

After considering these results, ***the workgroup reaffirmed with no substantive changes the IHCIF formula adopted by the IHS in FY 2001 after extensive tribal consultation.*** The elements that we reaffirmed include:

1. The FY 2002 formula allocates the \$23 million IHCIF to only those operating units that are funded at less than 60%. The results show that 169 operating units are below 60% and will qualify for a portion of the IHCIF. The \$23 million available in FY 2002 provides only 5.6% of \$408 million necessary to raise 169 operating units to 60%. Among the 169 operating units qualifying for IHCIF funds, the formula gives proportionately more funds to the least well funded operating units. Additionally, every operating unit is guaranteed funding to achieve at least 30%. This is consistent with the approach in FY 2001 and with Congressional direction to focus Indian Health Care Improvement funds to tribes that are “most in need”.
2. The Congress urged consideration for a minimum allocation to operating units that qualify for IHCIF funds. The workgroup set a minimum allocation of \$10,000 per operating unit last year. The \$10,000 minimum is continued for FY 2002 allocations.

3. The workgroup reaffirmed that the \$23 million FY 2002 IHCIF be allocated to local operating units and that such allocations be made recurring to the operating unit in years thereafter.
4. The workgroup reaffirmed the "IHCIF allowance guidance" provided by IHS headquarters to Area Offices acknowledging an opportunity for adjustments among Area operating units when determined with participation by Area tribes and Area operating units.
5. The Workgroup reaffirmed the need for review and improvement of the IHCIF formula on an annual basis. Members believe that a mid-year Workgroup meeting before the next allocation cycle would provide an opportunity for improving the methodology without the undue pressure of a "winners and losers" scorecard. Workgroup members re-elected Mr. James Crouch to continue as Tribal co-chair and urge you to retain Mr. Cliff Wiggins as Federal co-chair.

## **CONTINUING ISSUES OF CONCERN**

There is a list of serious and in some cases long standing issues of concern that the workgroup identified last year and that the IHS did not fully resolve in 2001. We again urge the IHS to address these as quickly as possible. Although the Workgroup recognizes that the IHS has made considerable efforts in 2001 to improve data collection systems, especially for user counts, these efforts have yet to accomplish all their goals. Sufficient resources must be marshaled at all levels to overcome these problems.

A theme heard consistently in all three regional consultation meetings is the need for a rigorous data driven formula to identify funding needs for public health, outreach and environmental health services not addressed in the FDI methodology. We understand this "wrap-around" effort is now beginning. We urge you proceed expeditiously.

A significant portion of the tribal leaders who participated in the regional consultation meetings expressed opinions that the methodology should not include third party coverage available to Indian people including Medicaid, Medicare, private health insurance and the Children's Health Insurance Program (S-CHIP). This opinion is driven in part by a feeling that increased reliance on these funding sources represents a rollback of the federal trust responsibility to Indian Tribes. Another reason expressed is that access to health care for Indian people should not be subject to means testing. Inclusion of these resources in the FDI methodology, however, is responsive Congressional directives established in statute in Section 1621 of the Indian Health Care Improvement Act. The Workgroup urges that you communicate as forcefully as possible to the Administration the critical role that the IHS plays in providing access to health services and coverage to the Indian community.

The Centers for Medicare/Medicaid Services (CMS) is the second largest funding source for health care services to the Indian community through its Medicaid, Medicare and S-CHIP programs. This activity has created a large body of encounter level data on health care services to AI/AN. Unfortunately there is a high level of misidentification of Indian Tribal status in this database. The IHS active user data set clearly identifies the Indian population that depends on the IHS as its primary health care provider. Matching these two data sets would provide the information to more fairly identify third party coverage by operating

unit. And, perhaps more importantly, it would provide the encounter level information necessary to update the cost benchmark for personal medical services. We understand the IHS has begun collaborating with CMS to share databases and match joint Medicare AI/AN beneficiaries. We also understand you have plans for similar statistical tabulations for matched Medicaid AI/AN joint beneficiaries. We urge you to complete this work.

We were briefed by telephone conference about a large CMS research project to investigate the extent and causes for gaps in AI/AN use and eligibility for CMS entitlements. Such information will be useful for some purposes, but we are disappointed that the study will not quantify the financial gap. We need this data to credibly update our cost benchmark to reflect meaningful differences in third party coverage among states, IHS Areas, and operating units. We believe this data is essential to promote real funding equity.

In the past several years, a significant number of tribes and health programs have responded to the lack of federal facility construction funding by entering into long-term debt to finance replacement of old and inadequate health care facilities. An extensive study done by the National Indian Health Board has documented the importance of this trend to the viability of the IHS funded health care delivery system. Servicing construction debt is generally accomplished through a long-term commitment of third party income, which would otherwise be available for the provision of health care services to tribal members. The task group recommends that the IHS develop a national database that would identify any health facility financing costs incurred by tribes so that any debt payments may be discounted from the FDI methodology.

The Workgroup again added counts of AI/AN who live outside of designated Contract Health Service Delivery Areas (CHSDA) and who regularly obtain direct care services in IHS and tribal health facilities though they are ineligible for referral under CHS. This approach rightly identifies the financial burden of providing care to these persons. Workgroup members remained concerned about the official IHS user definition and recommend that IHS fully explore legal, financial, and technical ramifications of revising the definition.

The Workgroup offers the following recommendations in recognition of the importance of timely, high quality data that is essential for determining accurate user counts and for many other worthwhile purposes:

- IHS should continue to improve methods for aggregation and tabulation of local user data into national user counts
- IHS and tribes must target additional resources to improve data collection and data quality in the front lines at operating units
- Additional funding is necessary for growing costs of broad band telecommunications links that are increasingly essential in everyday work at operating units
- Health system managers and tribal health leaders recognize that budget justification and accurate resource allocation depend on quality data (e.g., “funds follow data”)
- The Workgroup endorses a Restructuring Initiative Workgroup proposal to invest in improved data collection and tabulation at local levels and for better collaboration among operating units

- The Workgroup recommends that the Business Plan Workgroup also address investment in data as a major strategy for the next 5 year business plan
- IHS and tribes should continuously seek a reasonable balance between the benefit of increased data precision and the financial investment in data that is necessary get that benefit

The workgroup acknowledges that Contract Support Costs (CSC) funds are discounted too heavily in the IHCIF allocation model. Many items commonly paid from CSC funds are typical business costs experienced by any mainstream health plan. These costs are financed within the plan's premium structure and, therefore, are included in our actuarially determined benchmark price of \$3,582 per beneficiary. The workgroup agreed to discount CSC by 62% to assure that the IHCIF allocation formula is not unfairly biased against tribal contracts. We thought this was necessary because CSC is "on-budget" whereas some expenditures benefiting federal operating units for similar items are "off-budget". The extent of "off-budget" expenditures benefiting federal operating units is unknown at this time. Thus, we exclude "off-budget" federal expenses and 62% of available CSC resources from the personal health care services computation, although both would be more appropriately included in our computation if reliably known. The excluded CSC funds are counted as part of wrap-around total instead. This exclusion artificially lowers available funding for the benefits package by approximately 3-5% depending on the true extent of "off-budget" federal costs. We urge the IHS in the coming year to determine the extent of "off-budget" expenses so that we may appropriately count both those resources and CSC resources in the IHCIF methodology.

The FDI methodology is an actuarial based method of resource planning and distribution. It relies on techniques long used by both private industry and other governmental programs to calculate resource requirements. The Workgroup recommends that the IHS further integrate the approach into its budget development and justification activities. The identification of a \$1.8 billion shortfall in IHS funding for personal health care services for fiscal year FY 2001 is solid evidence of a historic under funding of health care for Indian people.

As co-chairs, we thank you on behalf of all Workgroup members for supporting our work and we look forward to hearing your decisions regarding a distribution of the \$23 million IHCIF.



James Allen Crouch M.P.H.



Cliff Wiggins, IHS Co-Chair

Enclosures

# Tab D



## Decision Memo for the FY 2002 IHCIF



March, 2002





DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Indian Health Service  
Rockville MD 20852

MAR 27 2002

TO: Director

FROM: Senior Operations Research Analyst

SUBJECT: Distribution of fiscal year (FY) 2002 Indian Health  
Care Improvement Fund--ACTION

ISSUE

The Congress appropriated \$23 million in fiscal year (FY) 2002 for the Indian Health Care Improvement Fund (IHCIF). This memo recommends for your approval a methodology for distributing the \$23 million fund to operating units of the Indian health system.

DISCUSSION

In FY 2000 and FY 2001, the Level of Need Funded (renamed the Federal Disparity Index-FDI) workgroup, developed a methodology for measuring gaps in health care funding to Indian people. The LNF actuarial study found that IHS funding is less than 60 percent compared to mainstream health plans such as the Federal Employees Health Benefit Plan. The workgroup also recommended a formula for distributing the IHCIF to tribes based on specifications contained in section 1621(a)4 of the Indian Health Care Improvement Act which requires the IHS to address deficiencies for "...those Indian tribes with the highest levels of health status and resource deficiencies"

In fiscal year 2001, the Indian Health Service (IHS) conducted extensive tribal consultation, including three regional forums and a national forum, on the allocation methodology. After additional consultation with tribal leaders, in April you adopted an IHCIF formula that distributed \$40 million on a recurring basis to local operating units.

The workgroup met March 19-20 2002 to accomplish an annual review of the methodology which is applied to updated data. After reviewing the IHCIF formula and considering its application with revised data, the workgroup reaffirmed with no substantive changes the formula adopted in FY 2001 after extensive tribal consultation.

The workgroup has submitted findings from the recently completed application of the FDI methodology and recommendations for

applying those findings in a formula to distribute the FY 2002 IHCIF among IHS Areas and operating units. The findings and recommendations are enclosed in the package entitled "2002 IHCIF" which is composed of sections A through F:

- Tab A: Table of the FY 2002 IHCIF Distribution among Operating Units
- Tab B: Guidance for the FY 2002 IHCIF Distribution
- Tab C: March 26, 2002 IHCIF Recommendations from the FDI Workgroup
- Tab D: Decision Memo for the FY 2002 IHCIF (copy of this memo)
- Tab E: Key Results and Methodology for FY 2001
- Tab F: IHCIF Chart Series for FY 2001

Please indicate your support for the recommendations by initialing on the "Approved" line.

**RECOMMENDATION 1**

I am conveying the request of the workgroup that you accept the allocation methodology recommended in their March 26 letter (Tab C) which reaffirms with no substantive changes the formula adopted in FY 2001 after extensive tribal consultation.

APPROVED *AF* DISAPPROVED \_\_\_\_\_ Date *05/3/2002*.

**RECOMMENDATION 2**

I recommend approval of allocations detailed in Tab A which were produced by applying the formula recommended by the workgroup to updated data.

APPROVED *A* DISAPPROVED \_\_\_\_\_ DATE *05/3/2002*.

**RECOMMENDATION 3**

Because the national application of the allocation methodology may incompletely account for certain complexities and variations in and among local level operating units, and section 1621(b)2a of the Indian Health Care Improvement Act requires that "...funds allocated to each service unit... shall be used to reduce the health status and resource deficiency of **each tribe** served by

such service unit", I recommend that an Area Office, after consulting with affected parties, may distribute IHCIF operating unit funds among the constituent parts of operating units based on actual service usage patterns or similar equitable measures. This guidance is detailed in attachment B.

APPROVED  DISAPPROVED \_\_\_\_\_ DATE 05/3/2002.

**RECOMMENDATION 4**

Given the workgroup reaffirmed the allocation methodology without change for FY 2002 and consistent with many proposals for maintaining stable funding for critically needed health services, I recommend the FY 2002 IHCIF distribution should be **recurring** to the operating units in years thereafter.

APPROVED  DISAPPROVED \_\_\_\_\_ DATE 05/3/2002.

  
Cliff Wiggins

Enclosure



# **Table**



## **Key Results and Methodology for FY 2001**



The IHCIF formula adopted in FY 2001 after tribal consultation was reaffirmed without substantive change and was applied to revised and updated data.

March, 2002



# FEHBP DISPARITY INDEX

## Key Findings for FY 2001

Result	Category
\$3,582 per user	• Actuarial price benchmark for AI/AN coverage in a FEHBP type health benefits package for 2001
1,387,982 users	• Active AI/AN user beneficiaries of the Indian health system as of September 30, 2001
\$4.96 billion	• Cost of the FEHBP benchmark health benefits package for 1,385,8625 AI/AN users
\$2,687 per user	• FEHBP price benchmark net of \$896 per AI/AN user for other coverage and payments
\$3.72 billion	• Balance of cost needed by IHS for the FEHBP benchmark health benefits package
\$1.92 billion	• Actual IHS expenditures for personal health benefits in FY 2001
\$1,384 per user	• IHS personal health care expenditures per AI/AN user in FY 2001
52% of need	• IHS funding percentage (\$1,384 expenditures per user / \$2,687 benchmark price per user)
63 OUs < 40%	• # IHS operating units funded < 40% of the benchmark (\$45 million shortfall)
171 OUs < 60%	• # IHS operating units funded < 60% of the benchmark (\$411 million shortfall)
231 OUs < 100%	• # IHS operating units funded < 100% of the benchmark (\$1.8 billion shortfall)

# FEHBP DISPARITY INDEX

## The methodology updated for 2001

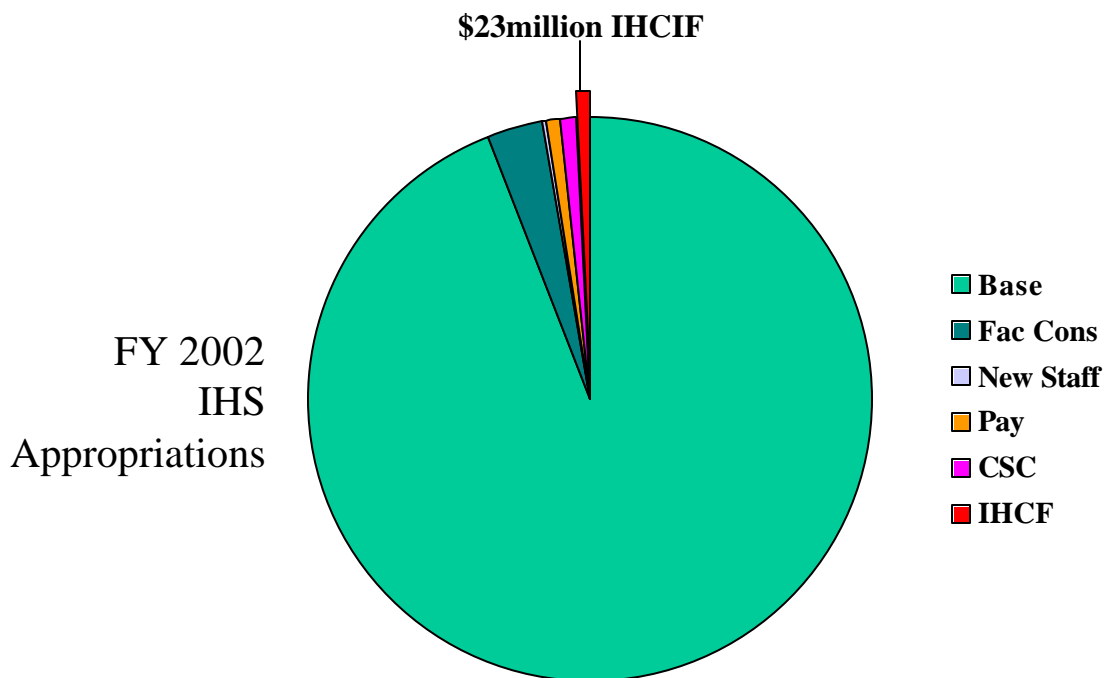
Element	Status
Active Users	<ul style="list-style-type: none"> <li>Replaced FY 1998 counts with updated 1,348,640 user count as of September 30, 2001 which is approximately 3% less than the artificially elevated 1998 user counts. Added an additional 39,342 users from Non-CHSDA areas for a total count of 1,387,982.</li> </ul>
\$3,582 Per User Benchmark	<ul style="list-style-type: none"> <li>Inflated the FEHBP \$3,221 benchmark premium by 11.2% to \$3,582. 11.2% is the US average premium increase in employer sponsored health plans in 2001.</li> </ul>
Variation for Size	<ul style="list-style-type: none"> <li>Reaffirmed adjustment to benchmark price based on size. The range is \$3,154 for units with &gt; 21,000 active users to \$4,657 for units with &lt; 900 active users.</li> </ul>
Variation for Prices	<ul style="list-style-type: none"> <li>Reaffirmed adjustment to benchmark for geographic price variations. The range is \$3,251 to \$4,370 in the lower 48 states and up to \$5,301 in Alaska.</li> </ul>
Variation for Health Status	<ul style="list-style-type: none"> <li>Reaffirmed adjustment to benchmark for health status based 2/3 disease burden (births, injuries, heart disease, diabetes, cancer, alcoholism and elderly) and 1/3 poverty. The range is \$3,314 for best to \$4,088 for lowest.</li> </ul>
- \$895 Per User Other Coverage	<ul style="list-style-type: none"> <li>Statute requires counting other (M&amp;M&amp;PI) resources for Indians. \$895, 25% of benchmark, is deducted from the \$3,582 benchmark. The deduction is 1/2 for operating units with no billable services.</li> </ul>
Available IHS \$ Per User	<ul style="list-style-type: none"> <li>Accounting for IHS funding was improved in FY 2001. Central funds, such as residual and area-wide programs, were identified uniquely for operating units. The IHS expended \$1.92 billion in FY 2001 for personal medical services.</li> </ul>
Wrap-around Exclusions	<ul style="list-style-type: none"> <li>\$780 million (28%) of IHS resources were identified as wrap-around and excluded for computations related to the benchmark benefits package.</li> </ul>
FEHBP Equivalence %	<ul style="list-style-type: none"> <li>The IHS expended \$1.92 billion in FY 2001 for personal medical services – a funding ratio of 52% of need compared to 51% of need in FY 2000. The 1% net improvement in FY 2001 is a consequence of higher medical prices offset by a lower user count and increased appropriations to IHS.</li> </ul>
60% IHCIF Threshold	<ul style="list-style-type: none"> <li>Reaffirmed a threshold of 60% consistent with Congressional direction to target funds to “most under funded units.” A \$10,000 minimum was set for qualifying operating units.</li> </ul>
Recurring Allocations	<ul style="list-style-type: none"> <li>Affirmed that the FY 2002 IHCIF (\$23 million) is allocated by formula to local operating units and that local IHCIF allocations be made recurring thereafter.</li> </ul>



# Tab F



## IHCIF CHART SERIES



Pie Chart of FY 2002 IHS Appropriations

March, 2002

Chart 1

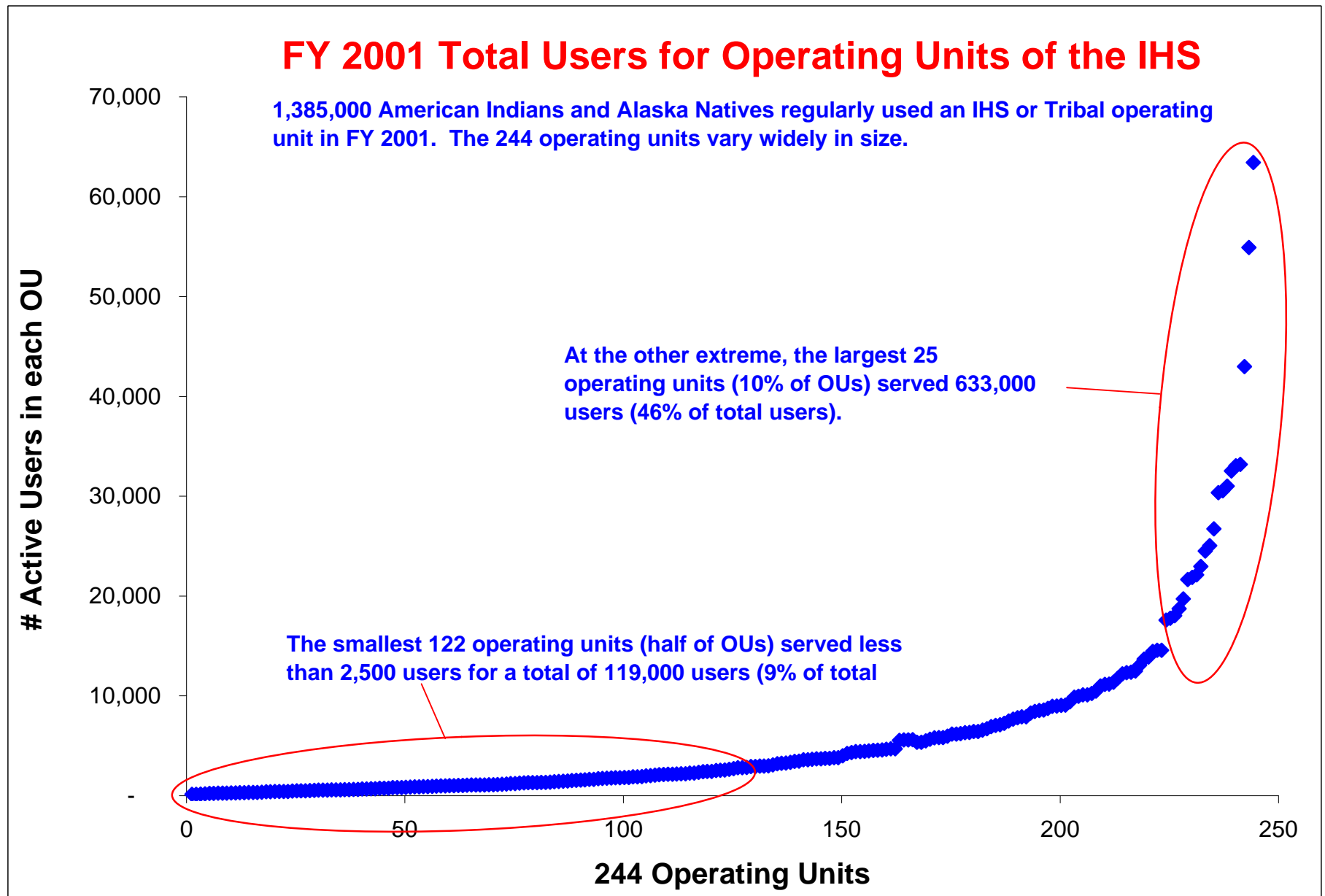


Chart 1a

**2001 Active Users for IHS Areas  
+ Users from Outside the Area CHSDA**

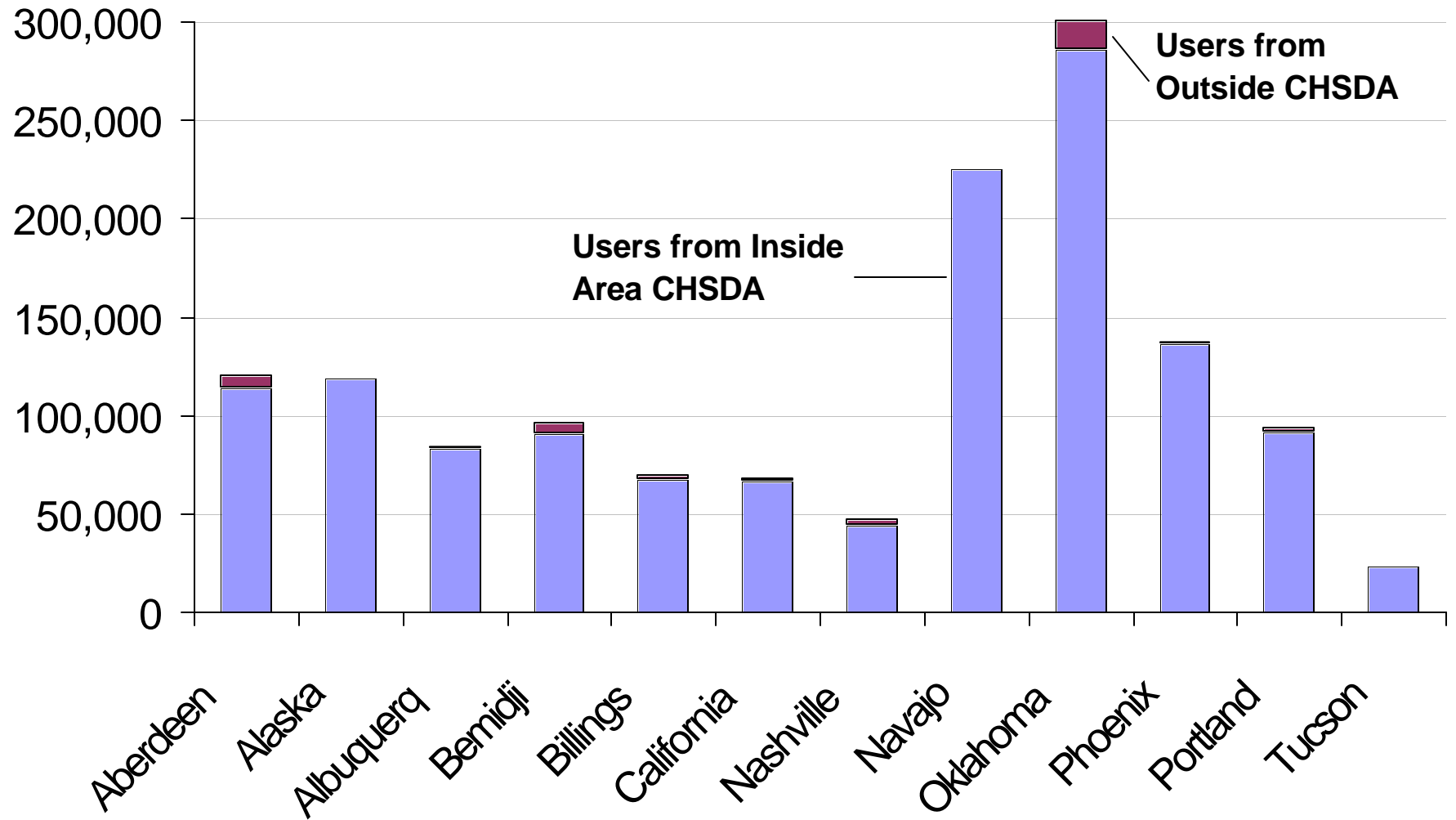


Chart 1b

## Change in Area Active User Count: FY 1998 to FY 2001

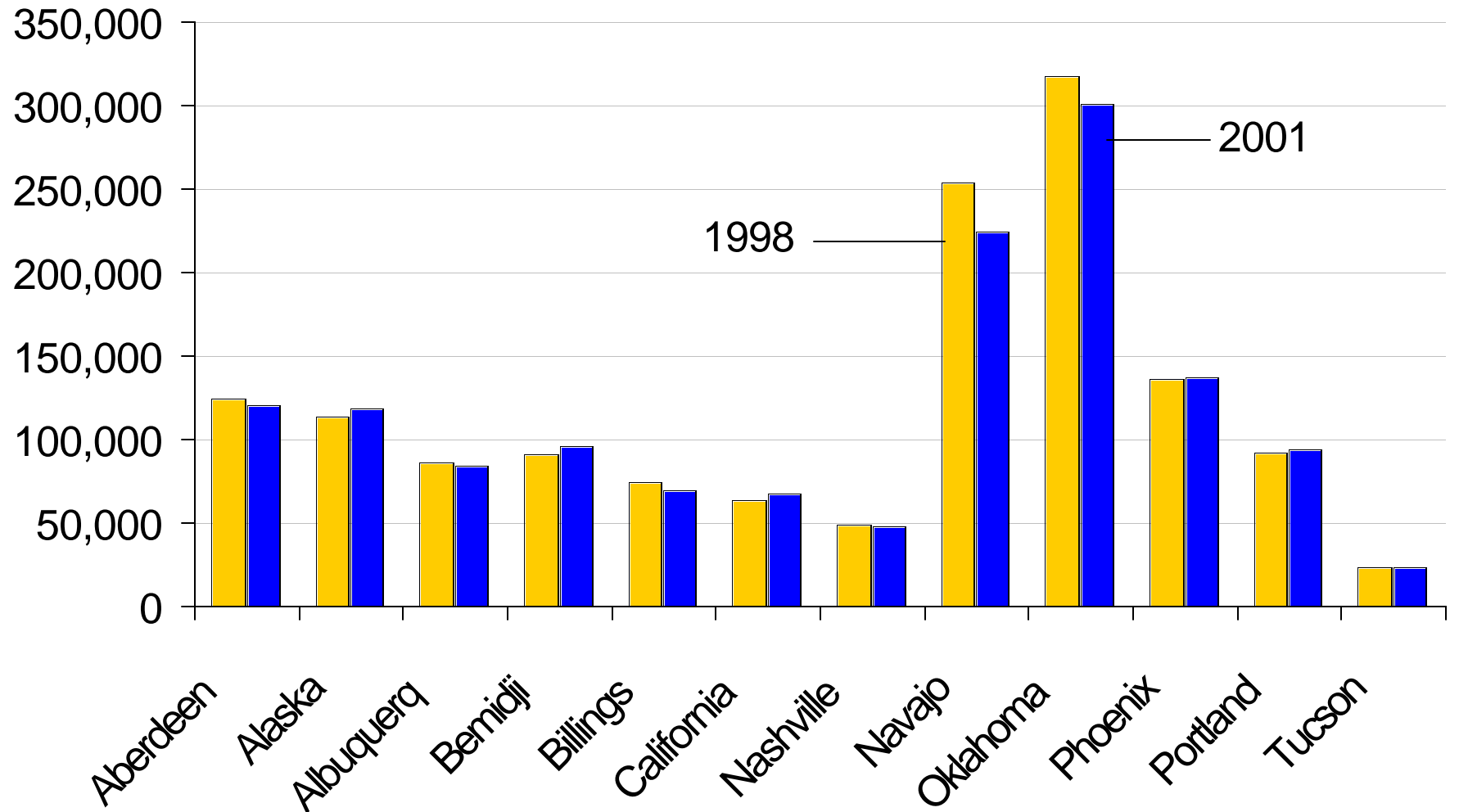


Chart 2

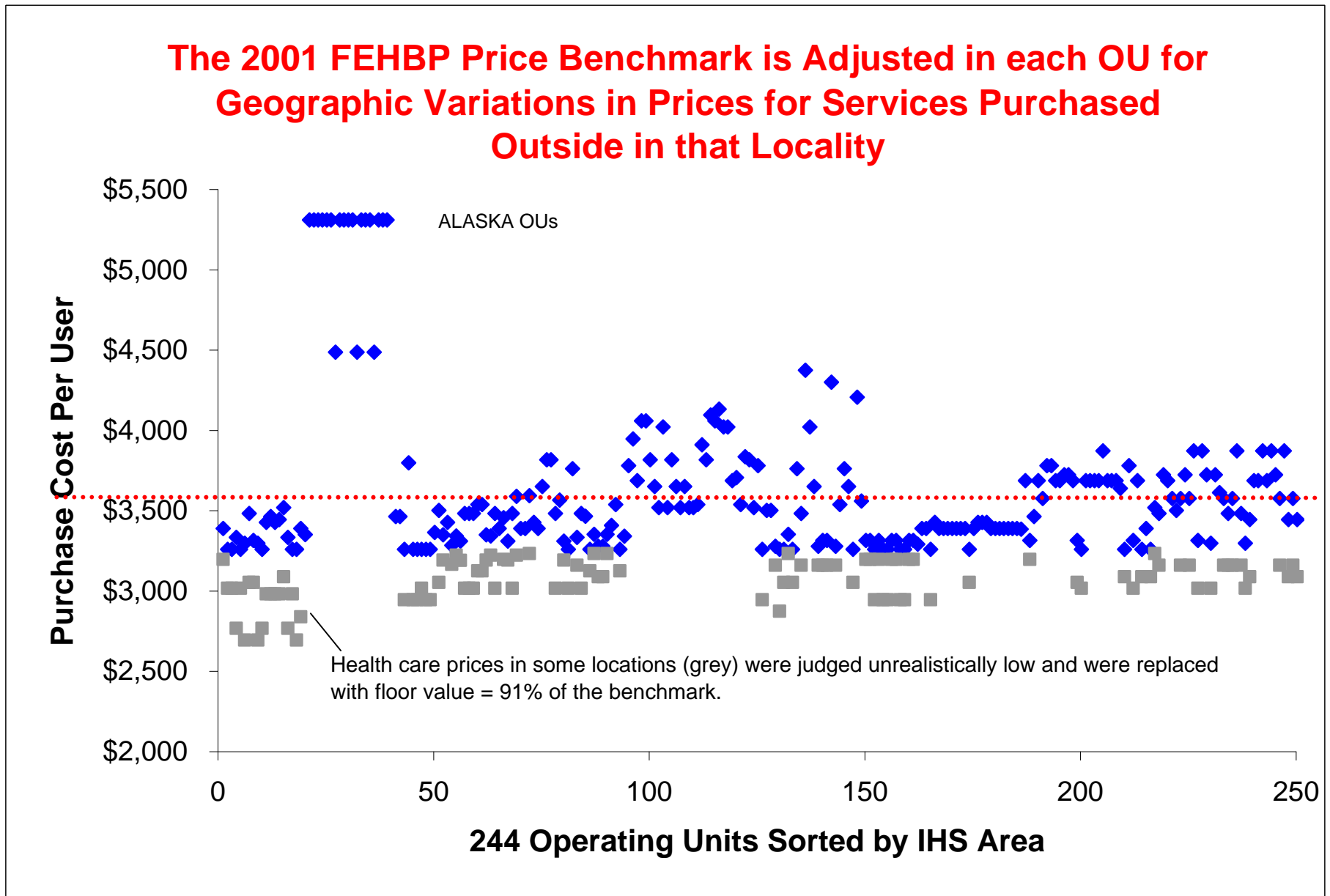


Chart 3

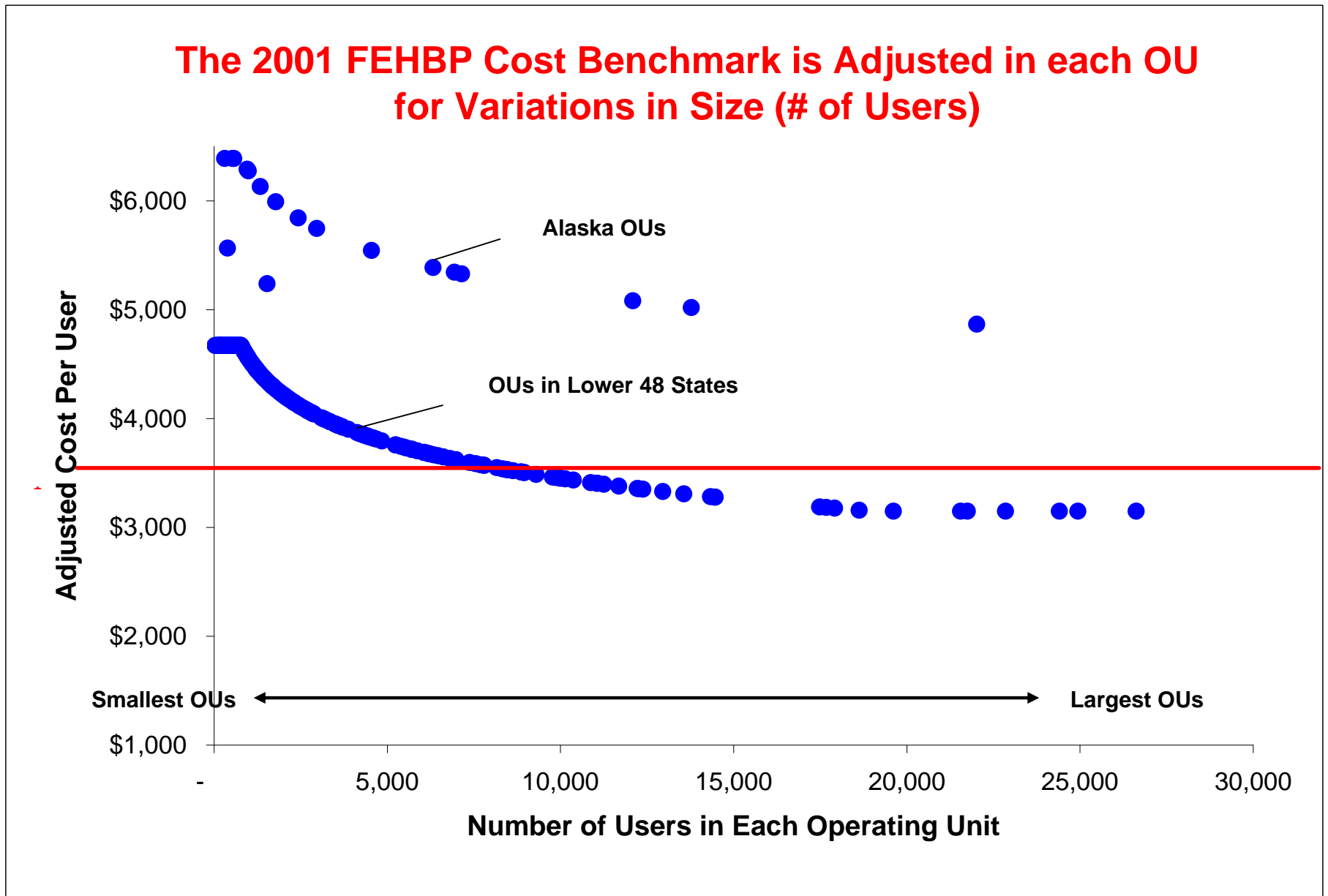


Chart 4

**The 2001 FEHBP Price Benchmark is Adjusted in each OU for Variations in the Poverty Rate of Users**

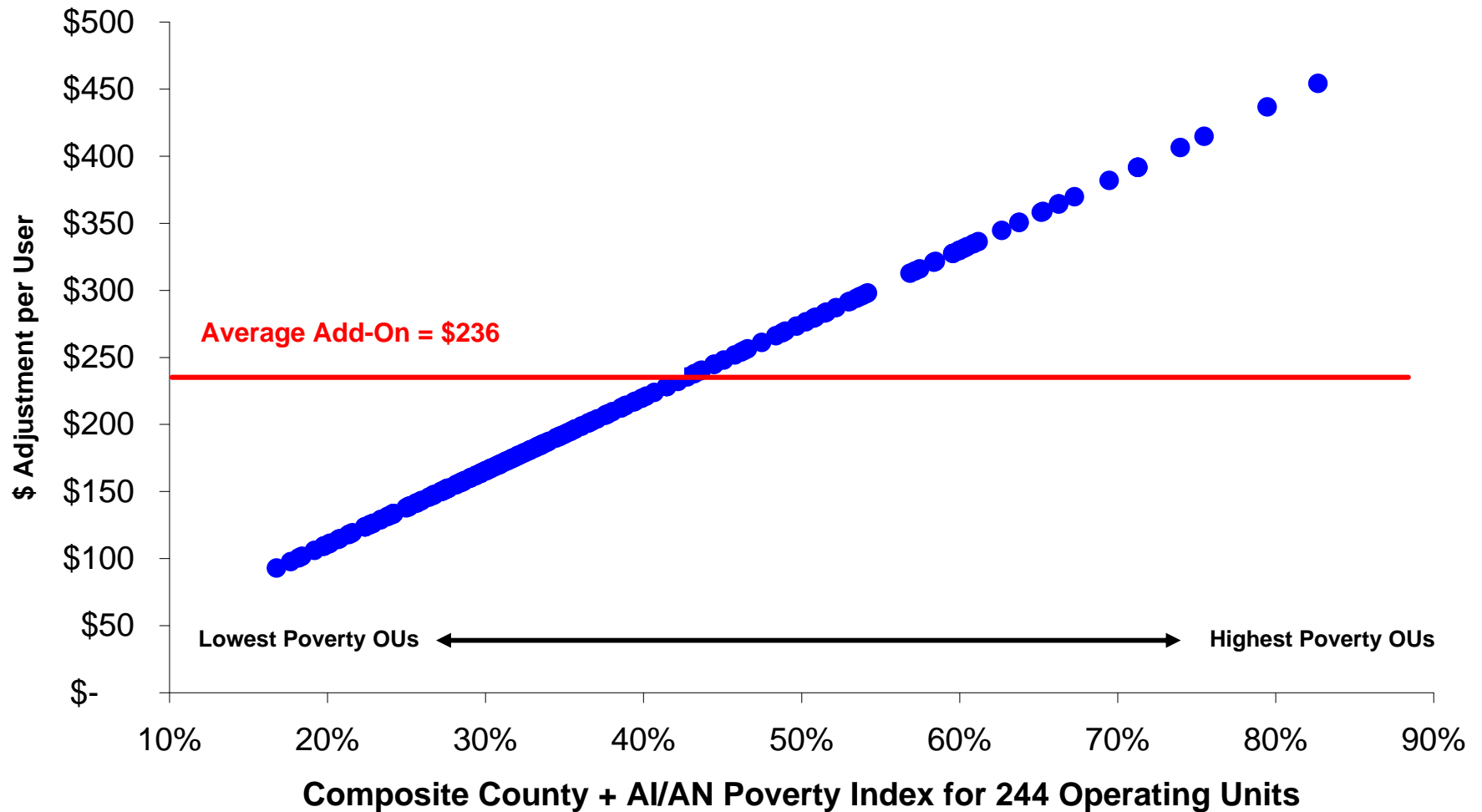


Chart 5

## The \$3,582 FEHBP Benchmark is Adjusted for Area Level Variations in AI/AN Health Status

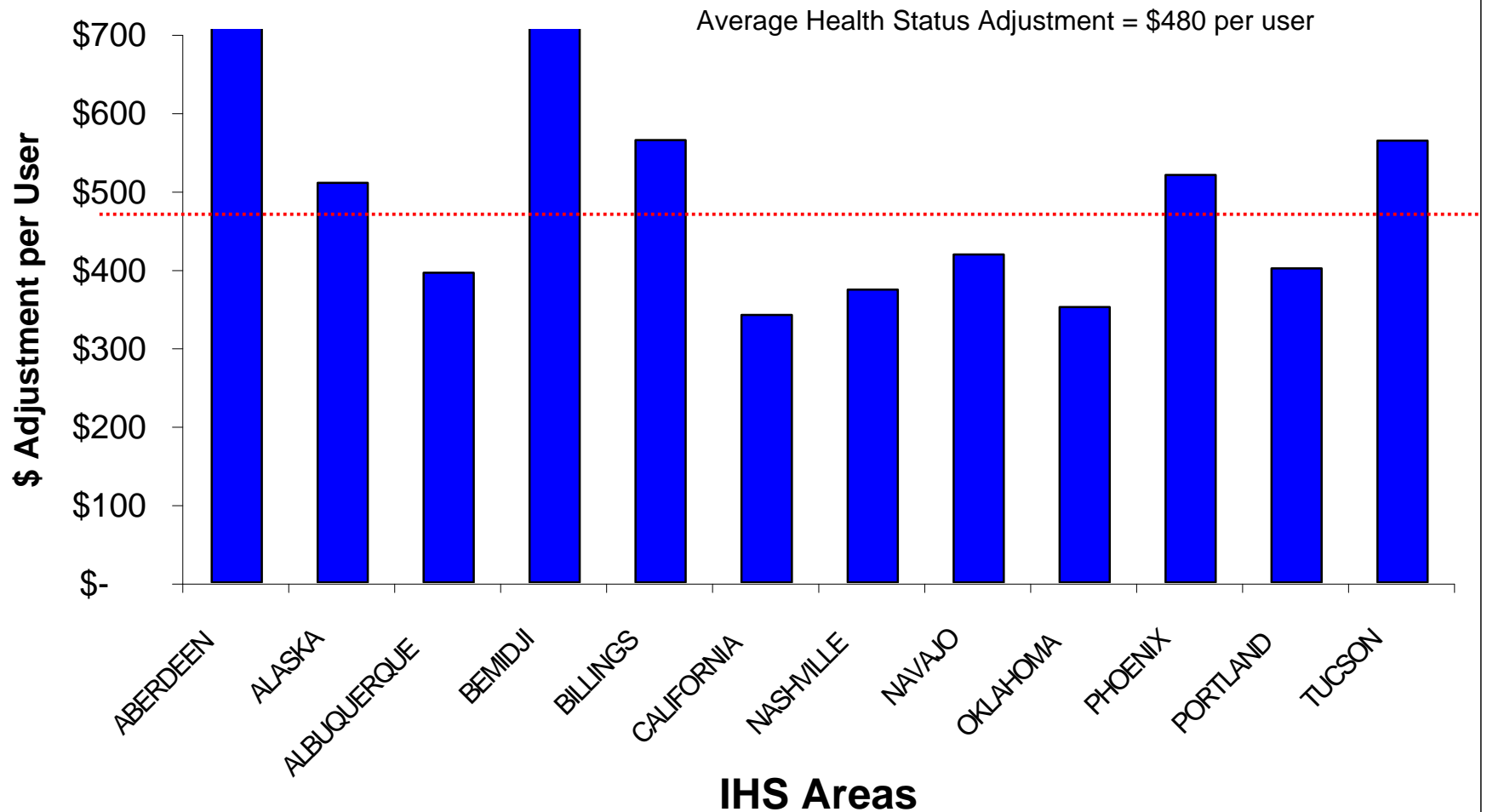




Chart 6

## The 2001 FEHBP Benchmark as Adjusted for the Combination of Poverty and Health Status

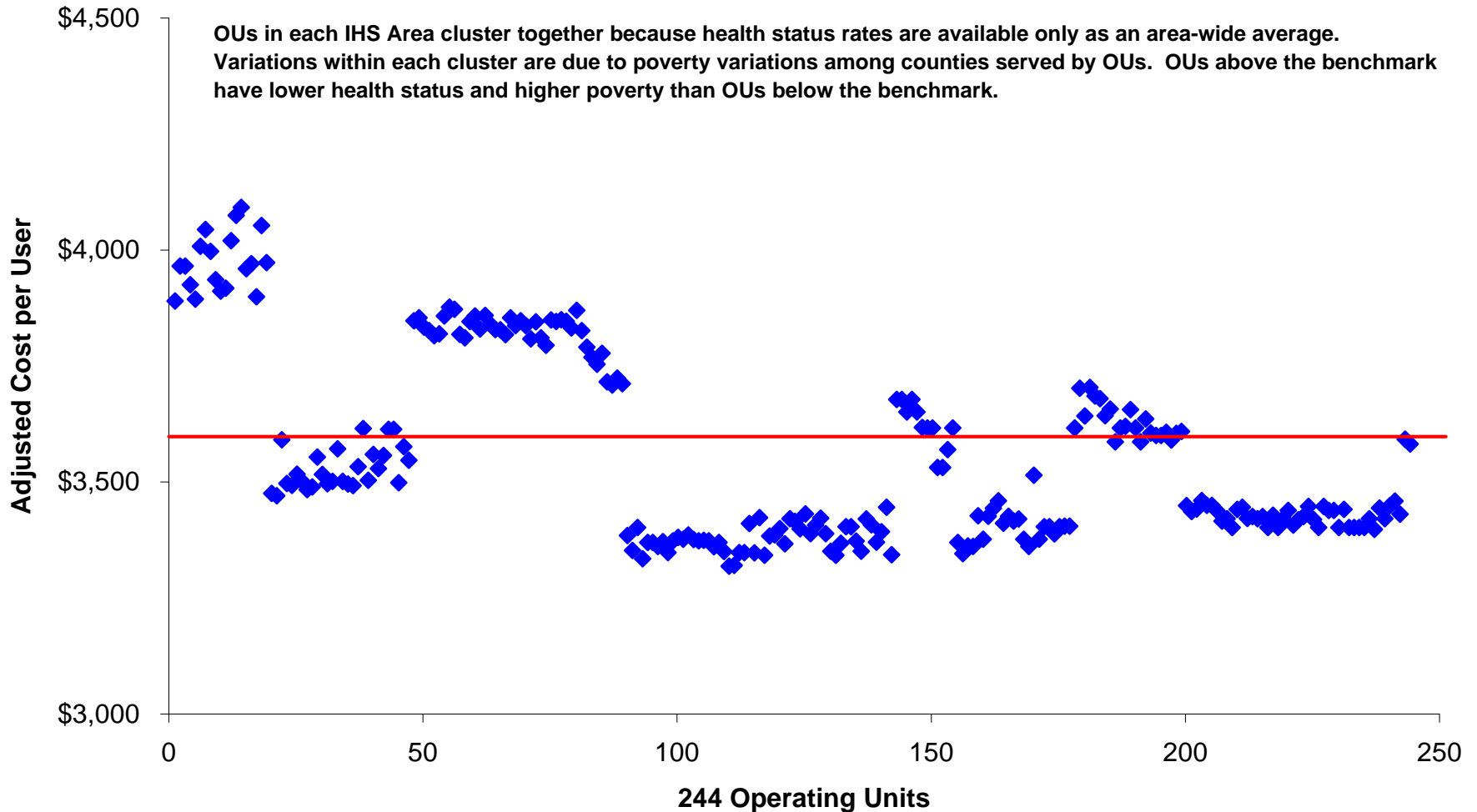


Chart 7

## FY 2001 FEHBP Cost Benchmark Adjusted for Local Variations in Price, Size, Health, and Poverty

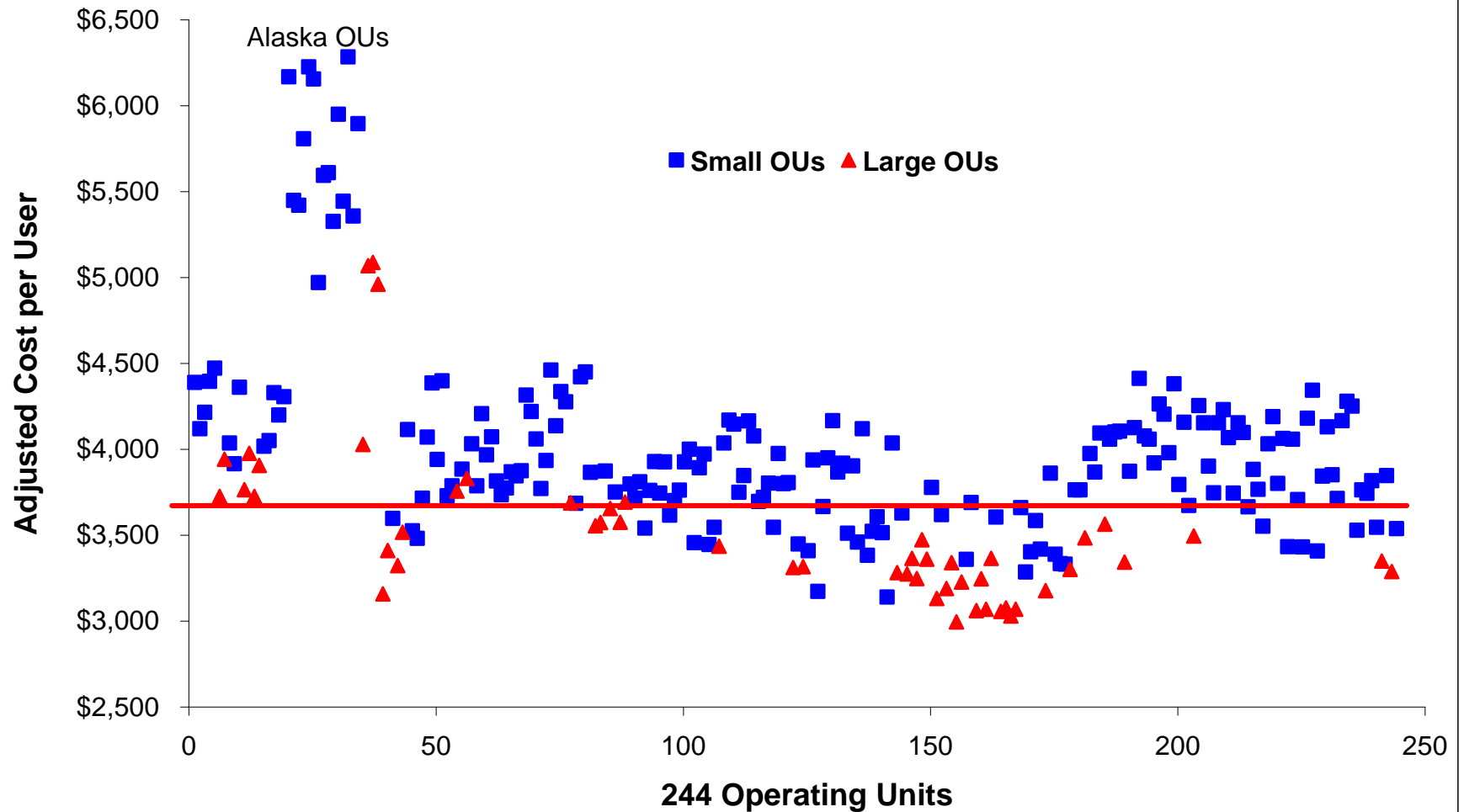


Chart 8

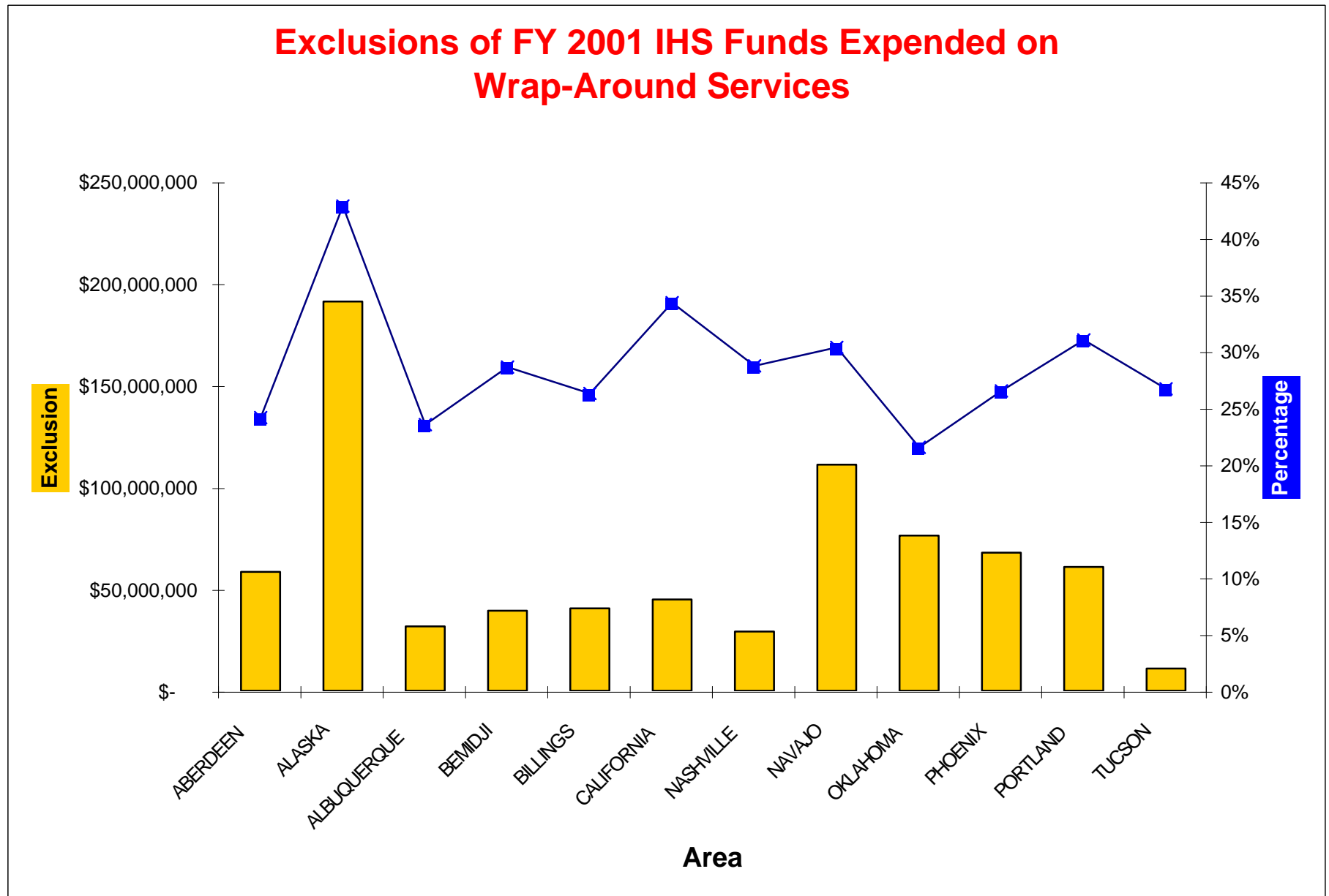


Chart 9

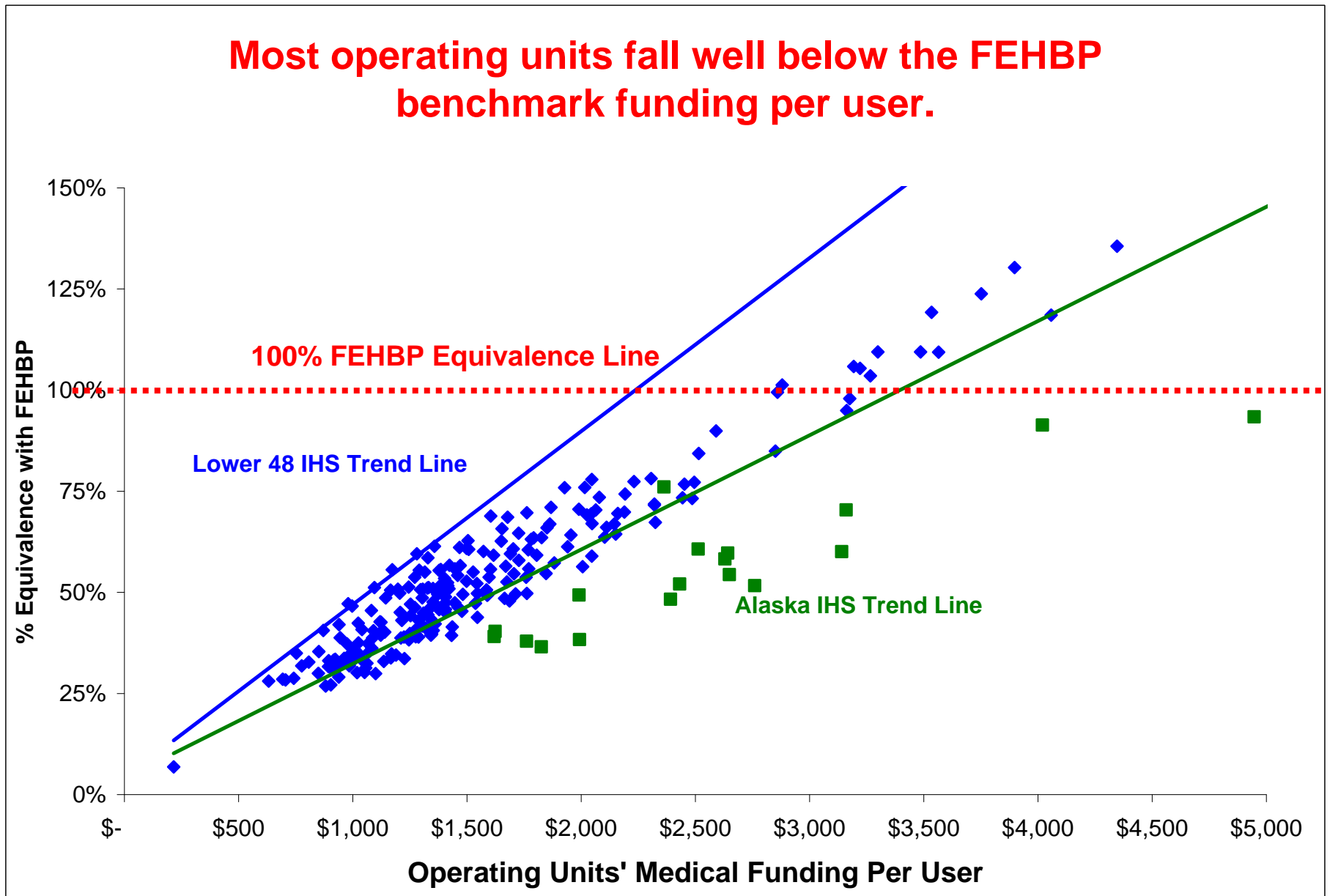


Chart10

## FY 2001 FEHBP % for 244 IHS Operating Units Available Funds as Percent of Actuarial Cost

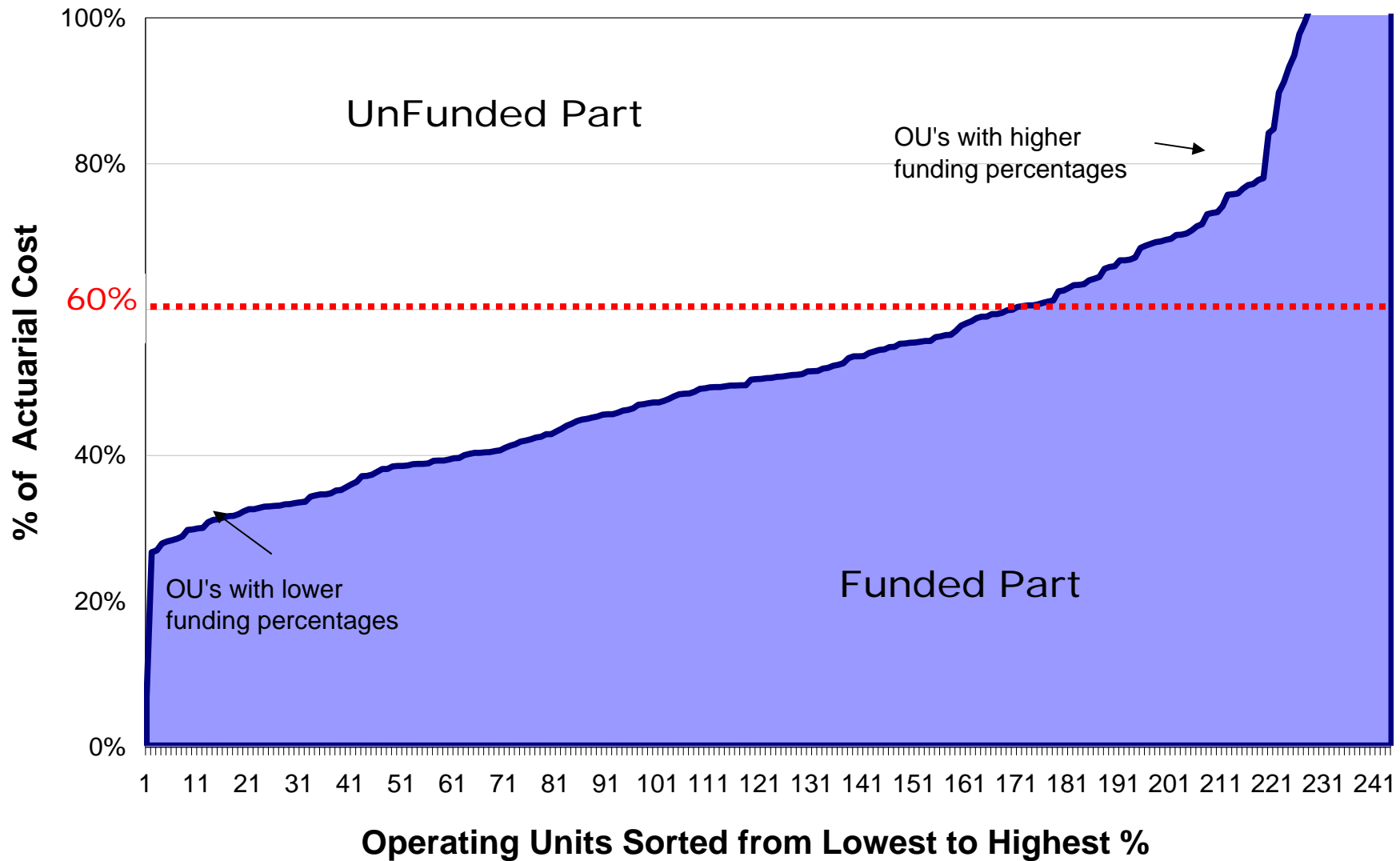


Chart 11

**FY 2002 IHCIF Allocations**  
**Lowest Funded OUs Recieve More IHCIF \$**

